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April 8, 2010

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Mr. Jose Cisneros  
Chief, Remediation & Reuse Branch  
Land and Chemicals Division  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
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Chicago, Illinois 60604

*mm 4/14/10*

Re: **Severstal Wheeling, Inc.'s Response to USEPA's Second RCRA § 3007  
Request for Information, Martins Ferry Plant**

Dear Mr. Cisneros:

We represent Severstal Wheeling, Inc. ("Severstal"). Enclosed please find documents and information responsive to the U.S. Environmental Protection Agency's March 15, 2010 information request concerning Severstal's Martins Ferry plant. These documents and information are timely. Also, please note that per a conversation with the Deputy Director of the Land and Chemical's Division of USEPA Region 5 this afternoon, USEPA has granted Severstal an additional 14 days to provide its written response to the information request.

Pursuant to 40 CFR Part 2, Severstal asserts business confidentiality over the information being submitted with this letter.

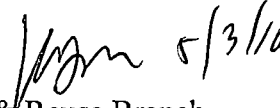
Please do not hesitate to contact me or Ken Komoroski with any questions.

Very truly yours,

Phillip M. Bender

PMB/mkf

April 22, 2010

Mr. Jose Cisneros  5/3/10  
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**Re: Severstal Wheeling, Inc.'s Response to U.S. Environmental Protection Agency's Second Request for Information Concerning Martins Ferry Facility EPA ID No. OHD 101 48 231**

Dear Mr. Cisneros,

We represent Severstal Wheeling, Inc. (formerly Wheeling Pittsburgh Steel Corporation). Attached is Severstal Wheeling, Inc.'s ("Severstal") response to the U.S. Environmental Protection Agency's ("USEPA") second information request, dated March 15, 2010, and received by Severstal on March 18, 2010. Per George Hamper, Acting Chief, Remediation and Reuse Branch, USEPA granted Severstal a two week extension of the original 21 day period in which to respond to USEPA's information request, though Severstal also timely submitted the documents responsive to the request at Mr. Hamper's request. Thus, this response is timely.

Severstal respects USEPA's authority to request and to obtain information. In the present case, USEPA has asserted that its authority is provided by Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), which speaks to gathering information concerning "hazardous wastes" for the purpose of rule-making or enforcement. In a 1986 memorandum to the Assistant Administrator for Solid Waste, USEPA General Counsel Francis S. Blake described USEPA's inspection authority under § 3007 as follows:

I believe that our inspection authority (including the authority to sample) extends to any establishment, place, or facility that either presently or in the past has handled solid wastes that EPA reasonably believes may meet the statutory definition of a hazardous waste. This authority is limited by the fact that *it must be used to gather information concerning hazardous wastes and must be exercised for the purposes of RCRA rule-making or enforcement.*

\* \* \*

[T]he exercise of this authority is expressly limited by only two conditions. First, the specific information gathered must relate to hazardous wastes. Second, it must be used for the purposes of RCRA rulemaking or enforcement.

It is clear that at least a portion of USEPA's information request exceeds this authority. Nonetheless, as with its response to USEPA's May 29, 2008 information request concerning Severstal's Martins Ferry plant, with this response Severstal strives to provide complete and accurate information to USEPA. Severstal reserves the right to supplement this response, as necessary and as additional and responsive information becomes available. In specific response to your March 15, 2010 letter to Bud Smith, Severstal's Director of the Environmental Control Department, Severstal disagrees with USEPA's assertions that it may have withheld information and documents in its response to USEPA's first information request concerning the Martins Ferry plant and we respectfully disagree that that prior response was "deficient." While Severstal may not agree with USEPA's assertions about the proper scope of its authority and its exercise of that authority in this case, Severstal has attempted to fully respond to USEPA's information requests and has responded fully despite such disagreements. Thus, we respectfully ask that you specifically identify how the prior response was deficient and under what specific program authority each such deficiency occurred. We also refer you to prior correspondence in which we point out misrepresentations made by USEPA on its authority position.

Pursuant to 40 CFR Part 2, Severstal asserts business confidentiality covering all of the information submitted in this response to USEPA's information request. In specific response to your March 15, 2010 letter, Severstal has previously responded to USEPA concerning its claim of CBI with respect to its response to USEPA's first information request.

As USEPA has requested, the certification statement assuring this data is included below.

Sincerely,



Kenneth S. Komoroski

cc: Bud Smith, Severstal  
Michael Mikulka, USEPA

**Attachments**

### Certification Statement

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature

 4/22/10

Bud E. Smith  
Director, Environmental Control

**Response to USEPA's March 15, 2010 Information Request  
For Severstal's Martins Ferry Plant**

Severstal's responses below are numbered to match each item of USEPA's March 15, 2010 information request. Severstal's responses contain the following:

- A. USEPA's initial May 29, 2008 information request;
- B. Severstal's July 3, 2008 response;
- C. USEPA's March 15, 2010 second information request; and
- D. Severstal's April 8, 2010 response.

Severstal has numbered the documents that it has attached in response to USEPA's March 15, 2010 information request as Attachments in sequential order to Severstal's previous Attachments 1 through 17 to its July 3, 2008 response. Thus, the first Attachment to this response is **Attachment 18**.

As an initial matter, as it previously has with USEPA's May 29, 2008 information request, Severstal objects to USEPA's March 15, 2010 request to the extent that it seeks information that is subject to attorney-client privilege, attorney work product privilege or any other applicable privilege. Severstal notes that USEPA seeks such information in the "General Instructions" to its information request ("The scope of this request also includes all information and documents independently developed or obtained by research on the part of WPSC, its attorneys....").

As an additional initial matter, and as it did in response to USEPA's first information request, Severstal objects to USEPA's March 15, 2010 information request to the extent that it seeks information beyond the scope of USEPA's authority. Generally, Severstal notes that USEPA's legal counsel, Thomas Williams, has consistently identified RCRA §3007 as the investigative authority under which USEPA is acting. Similarly, USEPA's May 15, 2010 information request specifically stated that such request is being made pursuant to RCRA §3007 only. Therefore, Severstal disagrees with and does not admit USEPA's assertion that any of the locations identified by USEPA on Attachment 1 (Preliminary List of Solid or Hazardous Waste Management Areas) to the first information request are "solid or hazardous waste management areas" or "units." As USEPA is aware from previous correspondence, Severstal disagrees with any characterization of these locations as "Solid Waste Management Units" (SWMUs) or "Hazardous Waste Management Units." Furthermore, since USEPA's information request is made pursuant to RCRA §3007 and seeks information "to determine the facility's compliance status with the regulations applicable to large quantity hazardous waste generators," Severstal questions and disputes the relevance of these designations. Severstal notes that many of the items of information sought in the information request concern materials that are exempt from or not covered by the provisions of RCRA §3007 or any of the other statutory authorities cited in the information request (42 U.S.C. §§ 6927, 6928(h), 6934 and 6973 and Ohio Administrative Code §3745-52) cited by USEPA as the basis for its request. While preserving and without waiving this objection, Severstal has provided all information it has been able to locate and identify in response to USEPA's second information request, as it did with USEPA's first information request, including information concerning materials and issues that may be beyond the scope of RCRA §3007.

For USEPA's information and so that USEPA will understand Severstal's good faith efforts to search for, locate and identify existing documents responsive to USEPA's information request, records concerning environmental regulatory matters are generally maintained in the files of Severstal's Environmental Control Department. The Environmental Control Department maintains its records pursuant to a document retention policy which requires the Environmental Control Department to maintain certain records per applicable USEPA and other regulatory requirements and timelines. For example, USEPA regulations require National Pollutant Discharge Elimination System ("NPDES") permittees to maintain NPDES Discharge Monitoring Reports ("DMRs") for a period of three years; Severstal maintains DMRs for its various facilities for, at a minimum, a three year period. In searching Environmental Control Department files in an effort to locate documents and information responsive to USEPA's information requests, Severstal made its best effort to locate and identify any potentially responsive document, and erred on the side of providing documents to USEPA that may be responsive if there was any question about whether information contained in a particular document was in fact what USEPA was requesting.

**Item #1**

- A. May 29, 2008 Information Request:** Provide simplified process flow diagrams for the overall facility production and for each current major process area. To the extent that the galvanizing lines currently in production are materially different, provide a process flow diagram for each line. If other production processes existed at the Martins Ferry plant in the past which have since been discontinued, provide process diagrams for those production processes, as well as a map showing where in the facility those processes operated. Include descriptions/process flow diagrams for former processes which operated at Plant 1.
- B. Severstal Response July 3, 2008:** In response to item 1 of USEPA's May 29, 2008 information request, Attachment 1 to Severstal's response contains an environmental flow diagram for the Martins Ferry plant. This diagram contains information regarding overall facility production and each current major process area.
- C. March 15, 2010 Information Request:** Provide simplified process flow diagrams for all past or former processes, as requested. Your response appears to depict only current processes.
- D. Severstal Response to March 15, 2010 Information Request:** In response to item 1 of USEPA's March 15, 2010 information request, Severstal is unaware of the existence of and, despite a diligent search, has been unable to locate or identify in its records any documents containing "simplified process flow diagrams for all past or former processes." As noted in B. above, Severstal previously submitted as Attachment 1 an existing environmental flow diagram for the Martins Ferry plant. That is the only process flow diagram Severstal could locate that was responsive to USEPA's information request.

### **Item #3**

- A. **May 29, 2008 Information Request:** Provide a list of all solid wastes currently generated at the Martins Ferry facility. Include an identification where such wastes are generated, and what process they are associated with. Provide a copy of all determinations made by Severstal supporting a conclusion that a particular solid waste generated at the facility is or is not a hazardous waste. Solid wastes associated with this request include, but are not limited to: zinc bag house dust; solids from alkali dip tank; vacuum filter solids from the wastewater treatment plant; chem-treat wastes at each of the 3 galvanizing lines; solids generated from the roll grinder shop; etc.
- B. **Severstal Response July 3, 2008:** Attachment 3 describes all the solid wastes currently generated at the Martins Ferry plant according to your request. Attachments 4 through 6 and 8 are the analytical results for representative samples of these wastes. Attachment 7 is the MSDS for the marking ink from which the ink sludge is derived. This is the basis for the “generator knowledge” determination of this hazardous waste. No “listed” hazardous wastes are generated at the Martins Ferry plant.
- C. **March 15, 2010 Information Request:** Your response only identified seven solid waste streams. Verify that you have provided the information requested. Your response does not state whether you have provided all determinations for all solid wastes that you generated at the Facility as of May 2008. With respect to the seven waste streams identified, waste determinations were only provided for five waste streams. Provide current waste determination information for the maintenance painting hazardous waste identified and for the “non-hazardous” rubber roll grinding waste identified.
- D. **Severstal Response to March 15, 2010 Information Request:** As described in Severstal’s July 3, 2008 response to USEPA’s May 29, 2008 information request, Attachment 3 listed the solid wastes currently generated at the Martins Ferry plant. Severstal’s July 3, 2008 response also provided the analytical results for representative samples of solid wastes generated at the Martins Ferry plant. Those analytical results were provided for five waste streams, rather than the seven waste streams identified in that response, because the two waste streams for which analytical results were not provided did not require the submission of samples for laboratory analysis in order to make a waste determination because Severstal determined that they were hazardous waste based on generator knowledge.

In further response, Severstal has identified an additional potential solid waste stream – Safety Kleen-managed spent parts washer solvent. As part of its contract with Severstal, Safety Kleen owns parts washers located at the Martins Ferry plant, provides solvent for those parts washers, fills and refills those parts washers with solvent, and collects and manages any spent solvent from those parts washers. The current analytical results for waste determination purposes indicate that the Safety Kleen-managed spent parts washer solvent is non-hazardous. See **Attachment 30**.

Severstal previously provided Attachment 3 and analytical results for waste determination purposes for representative samples from the five waste streams as USEPA

did not request all duplicative analytical results for the same waste streams. Severstal notes that USEPA's request seeks information and documents concerning solid waste currently generated at the Martins Ferry plant (as of May 29, 2008), not information and documents concerning solid wastes historically generated at the plant.

Severstal's current waste determination for the maintenance painting hazardous waste is based on generator knowledge. Severstal, based on generator knowledge, determined that the maintenance painting waste contains solvents which make it a hazardous waste. Severstal has not confirmed this generator knowledge based determination through laboratory analysis as such analysis is unnecessary to making the determination.

As described in Severstal's previous response, Severstal's waste determination for the "non-hazardous" rubber roll grinding waste was based on a 2002 laboratory analysis, previously submitted as Attachment 16. In response to USEPA's March 15, 2010 information request, Severstal has submitted an additional sample of the rubber roll grinding waste for laboratory analysis and those results are pending. Severstal will provide those results to USEPA upon receipt.

#### **Item #4**

- A. May 29, 2008 Information Request:** Provide a map showing the locations of existing hazardous waste accumulation areas, including satellite accumulation. Also, identify on the map the locations where solid wastes are generated as identified in item 3 above.
- B. Severstal Response July 3, 2008:** Attachment 9 is a map from our Hazardous Waste contingency plan showing the locations of existing hazardous waste accumulation areas. A similar map for non-hazardous wastes does not exist. Hazardous wastes generated at this plant may include Chem-treat waste, Ink Sludge, and Maintenance Painting wastes. Chem-treat waste is accumulated at the 48-inch and 60-inch Galvanizing lines (locations A and C) and loaded to a rolloff box the day of shipment at a location outside the north end of the plant (location G). Ink Sludge is stored in satellite accumulation drums at the 48-inch and 60-inch lines (locations A and C). Maintenance painting wastes are accumulated intermittently at the Paint House. When necessary, the Oil House (location F) may be used as a less than 90 day accumulation area.
- C. March 15, 2010 Information Request:** Attachment 9 was provided and is a map of existing hazardous waste storage locations. You were also requested to identify on that map the locations where solid waste are generated as identified in item 3. You identified four such locations in item 3. Those locations need to be identified on a copy of Attachment 9.
- D. Severstal Response to March 15, 2010 Information Request:** Severstal objects to USEPA's March 15, 2010 information request to the extent that it asks Severstal to create new documents, particularly new documents that modify existing documents, such as the map previously submitted as Attachment 9 to Severstal's July 3, 2008 response. Severstal is not attempting to mislead USEPA with this response or to fail to respond; Severstal is simply noting that USEPA authority does not extend to requiring Severstal to



create new internal documents in response to an information request, simply to provide responsive information that exists. Severstal has done that by identifying the locations where solid wastes are generated in item 3, as USEPA notes.

Still, as a show of Severstal's good faith and in an attempt to avoid any misunderstanding, Severstal has identified the locations where solid wastes are generated on a copy of Attachment 9 to Severstal's July 3, 2008 response, which is attached as **Attachment 18** and is specifically identified as a newly created document.

**Item #6**

- A. May 29, 2008 Information Request:** Provide a description and map of current storm water drains, infrastructure, and discharge points located at the Martins Ferry facility.
- B. Severstal Response July 3, 2008:** Attachment 10 contains information concerning the current and past stormwater drains, infrastructure and discharge points, including correspondence with the Ohio Environmental Protection Agency, sampling and analytical results and a map. See also response 7 below.
- C. March 15, 2010 Information Request:** You were asked to provide a description and map of current storm water drains, infrastructure and discharge points. No description was provided. You provided a partially legible map with no supporting explanation. Please provide a legible map and the description of the current storm water drainage system, infrastructure and discharge points. In correspondence with OEPA, you stated that Outfalls 003 and 004 were permanently sealed. However, the lines are shown on the map that you provided. Have the lines been removed? If not, how is storm water prevented from entering the lines and discharging to the river? What is happening with storm water from this section of the plant? Also, what is the status of Outfall 001?
- D. Severstal Response to March 15, 2010 Information Request:** In Severstal's July 3, 2008 response to USEPA's May 29, 2008 information request, Severstal described in item 7 the present status of current storm water drains, infrastructure and discharge points as follows:

Abandoned stormwater drains are shown on Attachment 10. Sewers for outfalls 003 and 004 were abandoned (plugged) in 2004. Outfall 002 is plugged with sediment as a result of hurricanes Ivan and Francis in 2004 and annual flooding. The outfall 005 sewer system no longer handles stormwater from the Martins Ferry plant since the lateral sewers entering the main 005 sewer were plugged in 2004 to prohibit any plant property stormwater from entering the 005 sewer system.

Severstal previously provided as Attachment 10 a map of the stormwater system. In response to USEPA's March 15, 2010 information request, Severstal has located a map from the 2007 Martins Ferry Stormwater Pollution Prevention Plan ("SPPP"), attached as **Attachment 19**, which shows stormwater sewers and locations where they have been plugged. (**Attachment 20**, the 2007 SPPP, also contains a map, though it does not identify the plugging locations).

**Attachment 19** shows the location of the plugging for Outfalls 003 and 004. Outfalls 003 and 004 were abandoned (plugged) in 2004. The lines themselves have not been removed. Severstal plugged Severstal's contributions to Outfalls 003 and 004 beginning at Severstal's first manhole upgradient from the Outfalls themselves. As Severstal's previous contribution to Outfalls 003 and 004 have been plugged at that first manhole, stormwater is thus prevented from discharging to the river through those lines. To Severstal's knowledge, stormwater from the section of the plant which was previously discharged through Outfalls 003 and 004 now falls on the ground surface and may also collect in portions of the lines but, due to the plugs at the first manholes, no longer discharges through Outfalls 003 and 004.

The Outfall 005 stormwater collection line enters the Severstal property from offsite and no storm water from the plant is directed to that line as it passes under the Severstal property.

Outfall 002 was plugged by sediment from heavy flooding by Hurricane Ivan and Hurricane Francis in 2004, as well as seasonal flooding each year thereafter. Severstal regularly inspects Outfall 002 to confirm that it remains plugged by sediment and Severstal has taken no action to unplug Outfall 002.

Outfall 001 is in use as the discharge point for treated wastewater and treated stormwater from the Martins Ferry plant's wastewater treatment plant.

**Item #7**

- A. May 29, 2008 Information Request:** Identify if there are any abandoned storm sewers at the Martins Ferry facility, and if so, identify their location on a map. State when such storm sewers were abandoned.
- B. Severstal Response July 3, 2008:** Abandoned stormwater drains are shown on Attachment 10. Sewers for outfalls 003 and 004 were abandoned (plugged) in 2004. Outfall 002 is plugged with sediment as a result of hurricanes Ivan and Francis in 2004 and annual flooding. The outfall 005 sewer system no longer handles stormwater from the Martins Ferry plant since the lateral sewers entering the main 005 sewer were plugged in 2004 to prohibit any plant property stormwater from entering the 005 sewer system.
- C. March 15, 2010 Information Request:** You identified that Outfall 2 was plugged with sediment from hurricanes in 2004. If the storm inlets were not plugged, then water would have to be discharging to the Ohio River. How is storm water being managed in this part of the plant?
- D. Severstal Response to March 15, 2010 Information Request:** See response to item 6 above. As we previously informed USEPA, Outfall 002 is plugged with sediment. To Severstal's knowledge, stormwater from the section of the plant which was previously discharged through Outfall 002 now falls on the ground surface and may also collect in portions of the lines behind the plugged area. To Severstal's knowledge, Outfall 002 remains plugged as of the date of this response.

Generally, stormwater at the Martins Ferry plant is managed under the plant's Stormwater Pollution Prevention Plan ("SPPP"). The SPPP is currently being updated. A copy of the current 2007 SPPP is attached as **Attachment 20**.

**Item #9**

- A. May 29, 2008 Information Request:** For each area and/or unit identified in the preliminary list of solid or hazardous waste management areas in Attachment 1, or for any other waste management unit historically or currently located at the Martins Ferry facility, briefly describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure; (vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas.
- B. Severstal Response July 3, 2008:** As noted above, Severstal disagrees with and does not admit USEPA's assertion that any of the locations identified by USEPA on Attachment 1 (Preliminary List of Solid or Hazardous Waste Management Areas) to its May 29, 2008, information request are "solid or hazardous waste management areas" or "units." Severstal has previously stated to USEPA on numerous occasions that Severstal disagrees with any characterization of these locations as "Solid Waste Management Units" (SWMUs) or "Hazardous Waste Management Units." Severstal notes that many of the items of information sought in USEPA's May 29, 2008 information request concern materials that are exempt from or not covered by the provisions of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6927, 6928(h), 6934 and 6973, or the Ohio Administrative Code cited by USEPA as the basis for its requests. As such, Severstal objects to USEPA's requests for information beyond the scope of the legal authority that it cites.

Please see Attachment 12.

Based on testing and/or generator knowledge, the areas identified by USEPA on its Attachment 1 do not have the potential to have or contain hazardous waste, except for those listed in Attachment 3 to Severstal's response (i.e., locations at which Chem-treat waste, Ink Sludge and Painting Wastes are gathered).

- C. March 15, 2010 Information Request:** Provide the information requested. Your response provides little substantive information. As noted in the accompanying letter, EPA here exercises its authority to determine for itself the nature of wastes and waste-related activity at the waste management areas listed at Attachment 1 to EPA's request. On available facts, EPA finds unconvincing your assertion that no potentially hazardous wastes could be found at any of the waste management areas. Your statements regarding how you would rather refer to the waste management areas also impose no limit on

EPA's authority. Your own provision of Attachment 3 identifies at least seven areas where solid wastes or hazardous wastes are managed.

- D. Severstal Response to March 15, 2010 Information Request:** Severstal restates and does not concede its previously raised objections to USEPA's allegations concerning the existence of "hazardous waste management areas" or "units," as discussed above at B and in its July 3, 2008 response.

Severstal's July 3, 2008 response provided detailed substantive information in response to USEPA's numerous questions. As part of that response, Severstal informed USEPA that "the areas identified by USEPA on its Attachment 1 do not have the potential to have or contain hazardous waste, except for those listed in Attachment 3 to Severstal's response (i.e., locations at which Chem-treat waste, Ink Sludge and Painting Wastes are gathered)." USEPA may have reached a particular legal conclusion regarding particular locations at the Martins Ferry facility, but USEPA's particular conclusions and USEPA's statutory authorizations do not require Severstal to agree with USEPA's conclusions. Instead, Severstal has provided and will continue to provide responsive factual information within its custody and control.

In further response, Severstal provides the following table containing information, as requested, concerning locations at which solid waste or hazardous waste is temporarily accumulated at the Martins Ferry plant. The locations for which information is provided in the table are numbered to correspond with the locations previously identified on Attachment 3 to Severstal's July 3, 2008 response.

<b>Location No. 1 – Galvanizing Lines</b>	
(i) location and function	Galvanizing lines; function as locations for galvanizing steel
(ii) size, volume, and capacity	Waste is collected and temporarily accumulated in 1 CY bags
(iii) physical integrity	Good
(iv) containment or other pollution control features	Concrete floor surface; under roof; curbed.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	<ul style="list-style-type: none"> <li>- The first galvanizing line was constructed and put in operation in 1953; Severstal has been unable to locate information as to when the additional lines became operational.</li> <li>- The galvanizing lines remain operational, and operate as necessary based on business conditions.</li> <li>- No RCRA closure necessary.</li> </ul>
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	<ul style="list-style-type: none"> <li>- Chem-treat waste is temporarily accumulated as a result of maintenance and cleaning of chem-treat sections. It is collected in 1 CY bags. There is a single 1 CY bag at the 48" line and a single 1 CY bag at the 60" line at any one time.</li> <li>- The galvanizing lines are not "hazardous waste management areas" or "units."</li> </ul>

(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases of chem-treat waste at the 48" line or at the 60" line.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	<ul style="list-style-type: none"> <li>- Severstal previously conducted an assessment of the 48" galvanizing line utility trench, which was concrete lined, removed materials that had collected in that trench, and filled the trench with concrete. Severstal submitted a proposal to OEPA concerning that activity and discussions with OEPA concerning that activity are ongoing.</li> <li>- Galvanizing lines are not "hazardous waste management areas" or "units."</li> </ul>
(ix) remedial actions performed to clean up these areas	<ul style="list-style-type: none"> <li>- See response to (viii).</li> <li>- No RCRA "remedial actions" are required.</li> </ul>
<b>Location No. 2 – 48" &amp; 60" Brander Sections</b>	
(i) location and function	48" and 60" Brander Unit Sections; function as a device by which the company name is stenciled onto the steel strip before it is coiled for shipment after galvanizing.
(ii) size, volume, and capacity	Ink sludge is removed from the solvent recycling unit. The sludge is placed in a 30 gallon metal container for satellite accumulation.
(iii) physical integrity	Good
(iv) containment or other pollution control features	Concrete surface; under roof; curbed.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	No RCRA closure necessary.
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	<ul style="list-style-type: none"> <li>- Ink sludge is collected and temporarily accumulated during recycling of solvents from Brander Units.</li> <li>- 48" and 60" Brander Unit Sections are not "hazardous waste management areas" or "units."</li> </ul>
(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases from the Brander Units operations.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	48" and 60" Brander Unit Sections are not "hazardous waste management areas" or "units."
(ix) remedial actions performed to clean up these areas	No RCRA "remedial actions" required.
<b>Location No. 3 – Paint House</b>	
(i) location and function	Paint House; functions as location for storing paint and equipment for maintenance projects.
(ii) size, volume, and capacity	Maintenance painting wastes are collected in 55 gallon drums.
(iii) physical integrity	Good
(iv) containment or other pollution	Concrete floor; enclosed building, under roof;

control features	maintenance painting wastes, when temporarily accumulated in Paint House, are held in 55 gal. drum.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	No RCRA closure necessary.
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	Maintenance painting wastes from intermittent painting of plant buildings and equipment are occasionally temporarily accumulated in the Paint House.
(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases from the Paint House operations.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	The Paint House is not a "hazardous waste management area" or "unit."
(ix) remedial actions performed to clean up these areas	- No RCRA "remedial actions" required.
<b>Location No. 4 – Temporary Containers North of WWTP</b>	
(i) location and function	Temporary Containers located north of the Martins Ferry plant's wastewater treatment plant (WWTP); function as containment for galvanizing line cleanup sludge.
(ii) size, volume, and capacity	Temporary containers are 20-30 cubic yard vacuum containers or 10,000-20,000 gallon frac tanks.
(iii) physical integrity	Good
(iv) containment or other pollution control features	The containers themselves provide containment. No additional or secondary containment is provided for temporary containers.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	No RCRA closure necessary.
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	Galvanizing cleanup sludge is temporarily accumulated.
(vii) associated spill or release history and spill or release control	On April 1, 2008, a small non-reportable antifreeze leak was discovered to have occurred to the soil in this area. This spill was promptly cleaned up. Severstal is unaware of any other records of spills or releases from the containers north of the WWTP.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	The containers north of the WWTP are not a "hazardous waste management area" or "unit."
(ix) remedial actions performed to clean up these areas	No RCRA "remedial actions" required.
<b>Location No. 5 – Four Baghouse Modules</b>	
(i) location and function	Four baghouse modules; function is to collect

	galvanizing and zinc pot dust.
(ii) size, volume, and capacity	Baghouse dust is collected in 1 cubic yard supersacks and transferred to a 30 yard cubic yard metal rolloff box.
(iii) physical integrity	Good
(iv) containment or other pollution control features	The storage areas for the supersacks and rolloff box are contained by concrete, and stormwater is drained for on-site treatment.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	No RCRA closure necessary.
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	Galvanizing bag house dust and zinc pot dust is temporarily accumulated.
(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases from the Baghouse operations.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	The containers at the baghouse modules are not a "hazardous waste management area" or "unit."
(ix) remedial actions performed to clean up these areas	No RCRA "remedial actions" required.
<b>Location No. 6 – Machine Shop</b>	
(i) location and function	Machine Shop; functions as location for conducting maintenance and repairs of equipment and machining of tools, as necessary.
(ii) size, volume, and capacity	Rubber roll grinding waste is collected in a 55 gallon drum.
(iii) physical integrity	Good
(iv) containment or other pollution control features	Concrete floor; enclosed building, under roof; rubber roll grinding wastes, when temporarily accumulated in Machine Shop, are held in a 55 gallon drum.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	- Date of initial construction of Machine Shop is unknown. - Machine Shop continues to operate. - No RCRA closure necessary.
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	Rubber roll grinding wastes from grinding of rubber rolls is, on occasion, temporarily accumulated in a 55 gallon drum.
(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases from the Machine Shop operations.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	The Machine Shop is not a "hazardous waste management area" or "unit."
(ix) remedial actions performed to	No RCRA "remedial actions" required.

clean up these areas	
<b>Location No. 7 – Wastewater Treatment Plant</b>	
(i) location and function	Wastewater Treatment Plant (WWTP); functions as wastewater treatment facility for Martins Ferry plant.
(ii) size, volume, and capacity	Wastewater treatment plant sludge is collected on a containment pad, then transferred to a 20-30 cubic yard metal rolloff container.
(iii) physical integrity	Good
(iv) containment or other pollution control features	The WWTP is a “pollution control feature.” It utilizes numerous tanks, pads, sumps and other containment structures to prevent the release of wastewater.
(v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure	<ul style="list-style-type: none"> <li>- The WWTP was constructed in 1971.</li> <li>- The WWTP continues to operate.</li> <li>- No RCRA closure necessary.</li> </ul>
(vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit	Wastewater treatment plant sludge from treatment of wastewater from galvanizing lines and strip rinsing is temporarily accumulated as part of WWTP’s operation.
(vii) associated spill or release history and spill or release control	Severstal is unaware of any records of spills or releases from the WWTP operations.
(viii) information on the nature and extent of contamination (including sampling date) in the vicinity of the area or unit	The WWTP is not a “hazardous waste management area” or “unit.”
(ix) remedial actions performed to clean up these areas	No RCRA “remedial actions” required.

#### **Item #10**

- A. May 29, 2008 Information Request:** Provide a list of all spills or releases of chemicals, hazardous material, and/or wastes (including items identified during facility-or government-led inspections) that have occurred at or adjacent to the Martins Ferry facility throughout its operating life. For each spill or release, include information on the location and date of the spill or release, types and amounts of material spilled or released, the facility’s response to the spill or release (including the preparation of any internal facility analysis, memorandum, or report relating to the spill or releases; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results), and any regulatory agency response to the spill or release. Whenever possible, the source of the spill should also be identified. Provide a list and description of all historical, current, or planned remedial actions to address spills or releases associated with the Martins Ferry facility. Include a map, list, and description of all impact areas in soil, groundwater, surface water, and sediment. Include a map, list, and description of all soil/sediment excavations and treatment operations, groundwater remediation, or other corrective measures that have occurred at the facility. Identify the location of each of these areas on a map, along with specific sampling locations and monitoring wells. Closure documentation and confirmatory sampling results (including soil, groundwater,



surface water, sediment, and wipe samples, as appropriate) should be provided for noted investigation and closure activities at the solid or hazardous waste management areas that have been identified thus far.

- B. Severstal Response July 3, 2008:** Attachment 13 is a list of incidents (7) in which a material was accidentally spilled. In four of these incidents the material was contained on pavement and did not enter the soil. Of the other three incidents, one exceeded a “reportable quantity” due to a diesel fuel spill that was promptly cleaned up.
- C. March 15, 2010 Information Request:** Provide the information requested, including without limitation 1) full information relating to spills; and 2) information relating to all spills occurring at or adjacent to the Facility throughout its operating life. Your response provides 1) partial information for seven spills or releases occurring at the Facility during or after 2000; and 2) no information relating to other portions of this request.
- D. Severstal Response to March 15, 2010 Information Request:** Severstal’s July 3, 2008 response to USEPA’s May 29, 2008 information request provided responsive information concerning “spills or releases of chemicals, hazardous material, and/or wastes” that Severstal could locate in its Environmental Control Department file for spills at the Martins Ferry plant. Severstal has re-reviewed its records to determine whether there are additional documents or information responsive to USEPA’s information request.

In further response, Severstal has prepared the following table, which contains information about incidents and remedial actions at the Martins Ferry plant:

<b>1. Martins Ferry 9/12/2007 Incident</b>	
location and date	North truck staging area; 9/19/2007
types and amounts of material	Diesel; precise quantity unknown but substantially less than full diesel tank of truck (Severstal personnel pumped 120 gallons from damaged truck diesel fuel tank).
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Cleanup. Severstal personnel used portable pump to empty passenger side diesel fuel tank of truck which had sideswiped exit east guard pole upon leaving scale area and, as a result, leaked diesel; used absorbent to clean up diesel that had leaked to ground, placed material in plastic bags for appropriate disposal. Martins Ferry Incident Report prepared (see <b>Attachment 21</b> ).
any regulatory agency response	None required; not reportable quantity.
source of material	Truck diesel fuel tank.

<b>2. Martins Ferry 9/12/2005 Incident</b>	
location and date	South of Machine Shop; 9/12/2005
types and amounts of material	MC 42 oil; 16 gallons
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Cleanup with floor dry; Environmental Incident Report (MF001) prepared (attached as <b>Attachment 22</b> ).
any regulatory agency response	None required.
source of material	MC 42 oil tote overfilled.
<b>3. Martins Ferry 1/14/2003 Incident</b>	
location and date	Storeroom; 1/14/2003
types and amounts of material	Mercury; estimated 3 lbs.
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Cleanup. Severstal personnel contracted environmental cleanup contractor Weavertown Environmental to conduct cleanup; material cleaned up as of 11:30 am on 1/16/2003.  Environmental Incident Report prepared (see <b>Attachment 23</b> ); noted in SPPP (see <b>Attachment 20</b> ).
any regulatory agency response	None required; no release to the environment. Spill was fully contained on concrete floor inside building.
source of material	Spill was due to fire damage.
<b>4. Martins Ferry 7/24/2002 Incident</b>	
location and date	WWTP; 7/24/2002
types and amounts of material	1000 gallons; material consisting of 95% water and 5% oil.
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil	Cleanup. Contractor spilled material from vac truck while offloading at WWTP. Vacuumed entire area of area. Severstal personnel contacted contractor to discuss incident.

staging areas; and soil TCLP results	Environmental Incident Report prepared (see <b>Attachment 24</b> ).
any regulatory agency response	None required.
source of material	Contractor's vac truck (which had been cleaning entry to 60" mill with water and soap and vacuuming up cleaning solution).
<b>5. Martins Ferry 11/14/2001 Incident</b>	
location and date	Asphalt pad at South East corner of the Oil House; 11/14/2001
types and amounts of material	Less than 1 gallon; Quaker Chemical LC00157 (oil product).
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Spill contained, plug tightened to stop dripping. Environmental Incident Report prepared (see <b>Attachment 25</b> ).
any regulatory agency response	None required.
source of material	Leaking tote.
<b>6. Martins Ferry 1/9/2001 Incident</b>	
location and date	Railroad tracks near Oil House; 1/9/2001
types and amounts of material	Chem-treat solution; approximately 320 gallons
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Cleanup. Severstal personnel provided initial cleanup response. C&K Industrial Services – Vac. Company also called in to conduct cleanup. All forklift operators were provided with additional training. Environmental Incident Report prepared (see <b>Attachment 26</b> )(see also <b>Attachment 27</b> ).
any regulatory agency response	Written Release Notification provided to Ohio Environmental Protection Agency ("OEPA")(see <b>Attachment 28</b> ).
source of material	Tote being transported by forklift.

<b>7. Martins Ferry 10/31/1988 Incident</b>	
location and date	South end of employee parking lot; October 1988
types and amounts of material	Material from alkali tank cleaning; quantity unknown.
response (including the preparation of any internal facility analysis, memorandum, or report; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results	Cleanup. Notification of Ohio Environmental Protection Agency. Analysis of material conducted (results unknown). Interoffice Correspondence prepared (see <b>Attachment 28</b> ).
any regulatory agency response	M. Moschell of OEPA notified; no information located concerning any OEPA follow up.
source of material	Cleanout from 60" alkali tank.

#### **Item #16**

- A. May 29, 2008 Information Request:** Regarding the former storage area location on a fill area behind the new acid/alkali storage area, provide a description of what types of materials and/or wastes have been stored here. On April 1, 2008, a pile of material which was described as being from a coal hopper and a brown unknown material were observed in this location. What were the source(s) of those materials? Provide any supporting information including the waste determinations and disposal manifests.
- B. Severstal Response July 3, 2008:** The reddish-brown material near the coal pile was sampled, determined to be non-hazardous, and disposed as such. See Attachment 14 (Analytical Report).
- C. March 15, 2010 Information Request:** Provide the remainder of the information requested. Your response only provided partial information regarding the reddish-brown material (e.g., not describing that material's source), and nothing regarding the other material observed, including its source and any supporting information including waste determinations and disposal manifests.
- D. Severstal Response to March 15, 2010 Information Request:** Despite conducting a diligent investigation of "the reddish-brown material," Severstal was unable to identify the source of that material. Severstal did determine that the material was not hazardous and disposed of it with other non-hazardous materials. Severstal cannot locate an existing manifest in its records for this non-hazardous disposal action.

Severstal determined that the pile of material "described as being from a coal hopper" was, in fact, coal.

### **Item #21**

- A. **May 29, 2008 Information Request:** Regarding the Roll Grinder shop, what is the typical schedule for grinding rolls from the Chem-treat area? What is the typical generation of waste solids from this area in kg/mo? Provide any supporting documents for waste determinations from this area.
- B. **Severstal Response July 3, 2008:** With regard to the "Roll Grinder shop" referred to in item 21 of USEPA's May 29, 2008 information request, the roll grinder for the rubber chem-treat rolls typically operates four hours per week to process a total of four rolls. Solids from this operation have been analyzed and found to be non-hazardous (see Attachment 16). As such, they are discarded with plant trash, and volumes have not been determined.
- C. **March 15, 2010 Information Request:** Provide the information requested. Your response does not state whether you have provided all supporting documents for waste determinations relating to roll grinder shop wastes. Attachment 16 does not conclusively support your contention that this waste stream is non-hazardous waste, notwithstanding the 4.3mg/L TCLP result for lead in the test conducted in December 2002. The recoveries for both barium and lead were outside the lower QC limits of the matrix spike duplicate sample. The waste stream needs to be resampled. In the interim, all wastes generated from this waste stream should be stored pending the determination.
- D. **Severstal Response to March 15, 2010 Information Request:** As Severstal previously information USEPA, the roll grinder for the rubber chem-treat rolls typically operated four hours per week to process a total of four rolls, though, due to a subsequent reduction in operations, as of the date of this response, operation may be reduced. Severstal previously analyzed solids from this operation and found those solids to be non-hazardous (see Attachment 16 to July 3, 2008 response). As such, Severstal discarded such non-hazardous solids with plant trash, and did not determine or track the volume of solids produced.

As USEPA directed in its March 15, 2010 information request, Severstal has collected a sample of the rubber roll grindings from the Chem-treat section and submitted that sample for laboratory analysis. Severstal is awaiting the results of that analysis and will provide those results to USEPA upon receipt. Also as USEPA directed, Severstal has suspended disposal of rubber roll grinding waste from the Chem-treat section pending the final results of the laboratory analysis.

### **Item #22**

- A. **May 29, 2008 Information Request:** During the inspection on April 1, 2008, Transformer TF-3A, Serial Number 6530907, with an oil volume of 1,790 gallons, was observed to be leaking to the concrete pad. The leak was in close proximity to a surface drain that reportedly drains to the wastewater treatment plant. What type of oil is used in this transformer? Have PCBs been used in this transformer? Has the leak been repaired? Provide supporting documentation.

- B. Severstal Response July 3, 2008:** Severstal requests clarification from USEPA concerning the possible hazardous waste significance of PCB and non-PCB equipment. As USEPA knows, the RCRA program does not cover PCB equipment. Nonetheless, in order to be as cooperative as possible, Severstal provides the following information.

Based on our observation after the April 1, 2008 inspection referred to in item 22 of USEPA's May 29, 2008 information request, the signage for the transformer in question may have been confusing to USEPA. Transformer TF-3A, Serial No. 6530907, shows no evidence of leakage. Transformer TF-1A, Serial No. 10556, has black staining on the concrete pad beneath it. This latter transformer is shown in USEPA pictures provided to Severstal after the April 1, 2008 inspection. Based on this, Severstal assumes that USEPA is actually referring to Transformer TF-1A.

Transformer TF-1A uses 10 C mineral oil as its cooling medium. To the best of Severstal's knowledge, PCBs have never been used in this transformer. To Severstal's knowledge, no active leak was observed on April 1, 2008, and no such leak has been observed since. Additionally, Severstal does not believe the "weathered" stain below Transformer TF-1A poses a risk to the environment. Still, as a precautionary measure, an outside electrical equipment contractor has been contacted to assess whether Transformer TF-1A is currently at risk to leak and recommend repairs, if needed.

- C. March 15, 2010 Information Request:** Provide the information requested. Your response did not provide the requested information, for example regarding the transformer identified by EPA, its contents, and your repair of the observed leak. The leaking transformer identified by EPA was clearly transformer TF-3A, Serial Number 6530907.
- D. Severstal Response to March 15, 2010 Information Request:** As noted in Severstal's July 3, 2008 response, Transformer TF-3A, Serial No. 6530907, was examined by Severstal and showed no evidence of leakage. Transformer TF-3A, Serial No. 6530907, was taken out of service in October 2008, and is currently marked as such. Transformer TF-3A, Serial No. 6530907, contained 10 C mineral oil as its cooling medium. To the best of Severstal's knowledge, PCBs have never been used in this transformer. As no leak or evidence of leakage of Transformer TF-3A, Serial No. 6530907 has been observed, no "repair" of Transformer TF-3A, Serial No. 6530907 is necessary or has been conducted. Severstal investigated the location of Transformer TF-3A, Serial No. 6530907, and could not locate or identify any staining present near Transformer TF-3A, Serial No. 6530907.

#### **Item #24**

- A. May 29, 2008 Information Request:** Provide updated detail on current status and investigation of the old buried clay pipeline from the acid and alkali tank to the WWTP's concrete holding pit (as discussed in Reference 44).

- B. Severstal Response July 3, 2008:** Currently, Severstal has no knowledge of any evidence that the integrity of the “old buried clay pipeline” referred to in item 24 of USEPA’s May 29, 2008 information request has been compromised.
- C. March 15, 2010 Information Request:** Provide the information requested. Your response does not provide the status and investigation of the old buried clay pipeline, referenced during the April 8, 2003, CEI, as of May 2008.
- D. Severstal Response to March 15, 2010 Information Request:** As of May 2008, Severstal believes that the “old buried clay pipeline” discussed in USEPA’s Reference 44 to its May 29, 2008 information (an April 18, 2003 letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC) is the Outfall 001 sewer upstream of the Martins Ferry plant’s WWTP sump. Severstal has not conducted an investigation regarding this pipeline.

**Item #26**

- A. May 29, 2008 Information Request:** The wastewater treatment plant was inspected on April 1, 2008. During the inspection, it was observed that the oil skimmer was not operating. Is this the usual operating practice? How would oil be removed in the event of a spill if the oil skimmer was not operating? Provide any explanation why the oil skimmer was not operating.
- B. Severstal Response July 3, 2008:** With regard to the USEPA inspection of the Martins Ferry plant’s wastewater treatment facility on April 1, 2008 as referred to item 26 of USEPA’s May 29, 2008 information request, the oil skimmer located at that facility does not operate continually, but instead is operated on an as-needed basis as determined by the facility’s operator. At the time of USEPA’s April 1, 2008 inspection, the operator did not believe that the skimmer needed to be in operation, based on the operator’s observations and knowledge of the facility.
- C. March 15, 2010 Information Request:** How would oil be removed in the event of a spill if the oil skimmer was not operating?
- D. Severstal Response to March 15, 2010 Information Request:** When the oil skimmer is not being operated, any oil entering the WWTP sump accumulates on the surface of the water in the sump. This collected water (and any oil atop it) is prevented from overflowing or otherwise escaping from the WWTP sump by the elevated weir wall. The WWTP operator periodically turns on the oil skimmer, as needed, based on visual observations and/or information from plant personnel concerning incoming wastewater flow. In the event that a “spill” of oil or some other event leads to an unusual volume of oil entering the WWTP sump during a period when the oil skimmer is not being operated, the facility’s operator turns the oil skimmer on in order to remove the oil. In the event that the WWTP sump collects an unusually large volume of oil, Severstal has in the past utilized a contractor to remove excess oil with a vacuum truck on such occasions, and Severstal intends to continue that practice, as necessary.

**Item #27**

- A. **May 29, 2008 Information Request:** According to the Severstal letter cited as Reference 3 in Attachment 2, a background soil sample was collected from area 12 as part of the corrective action implemented in early 1989. It is unclear whether this sample was a background sample (as reference in the cited letter) which would have been collected from some other presumably un-impacted portion of the facility for comparison. The letter of the text appears to indicate that this sample was actually a confirmation soil sample collected beneath the excavation area. Provide additional detail as to the location from which this sample was collected, and any other means used to verify that contamination associated with the sludge release was satisfactorily remediated both laterally and vertically.
- B. **Severstal Response July 3, 2008:** Severstal could not locate the letter identified by USEPA as Reference 3 on Attachment 2 to USEPA's May 29, 2008 information request, which Severstal notes is identified on that "Preliminary Reference List" as a December 9, 1988 letter from the Ohio Environmental Protection Agency to Severstal, not a letter from Severstal. Additionally, Severstal could not locate the background information described in item 27 of USEPA's May 29, 2008 information request.
- C. **March 15, 2010 Information Request:** Provide the information requested. A copy of the December 9, 1988, letter from the OEPA, as well as a copy of your 1999 Contingency Plan, for your reference.
- D. **Severstal Response to March 15, 2010 Information Request:** As noted in Severstal's July 3, 2008 response, Severstal could not locate the background information described in item 27 of USEPA's May 29, 2008 information request, including whether the sample referenced by USEPA (and Ohio Environmental Protection Agency in the referenced December 9, 1988 letter) was a background sample or a confirmation soil sample and additional details as to the location from which the sample was collected.

**Item #28**

- A. **May 29, 2008 Information Request:** During the inspection, the Plant 1 electrical substation was inspected. Three large transformers (TF7A, TF7B and TF7C) and three smaller transformers (TF14A, TF14B, TF14C) were observed in this area. One of the large transformers is out of service but has not been removed. Stained soil was observed in the transformer area associated with each of the large transformers, as well as staining of both the soil and concrete pad associated with the 3 smaller transformers. In addition, soil staining appears evident on the soil outside but adjacent to the transformer area. See photos from Camera 1, P4010010 and P4010011. Do any of these transformers contain or have they ever contained PCBs? If so, what PCB product was used in the transformers, and when was it used? Regarding the stained soil, has any sampling been done of the soil in this area? If so, provide a copy of the results. What is the cause of the soil staining in the area outside the fence, adjacent to the transformers? Has any sampling been done of the soil in this area? If so, provide a copy of the results.
- B. **Severstal Response July 3, 2008:** Severstal requests clarification from USEPA concerning the possible hazardous waste significance of PCB and non-PCB equipment.



As USEPA knows, the RCRA program does not cover PCB equipment. Nonetheless, in order to be as cooperative as possible, Severstal provides the following information.

With respect to the Plant 1 electrical substation transformers referred to in item 28 of USEPA's May 29, 2008 information request, to the best of Severstal's knowledge, none of these transformers has ever contained PCBs. During USEPA's April 1, 2008 inspection, USEPA obtained a soil sample from this location. After conducting a laboratory analysis, USEPA provided Severstal with analytical results which indicated that no PCBs were detected in that soil sample.

With regard to EPA assertion of soil staining outside the fence and adjacent to the transformers as referred to in item 28 of USEPA's May 29, 2008 information request, and in reviewing the photos provided by Ohio EPA and our subsequent observations we have located no stained soil outside the substation fenced area. Further investigation of soils inside the substation is not feasible until such a time as this substation is de-energized. Severstal has no schedule for this activity at this time.

- C. **March 15, 2010 Information Request:** Provide the information requested. Your response does not state 1) whether you performed any sampling in or around stained soils, either inside the fence of or adjacent to the Plant 1 electrical substation; or 2) the cause of observed staining outside the substation fence. Regarding the staining outside the substation fence, EPA notes that it pointed out this staining to your representative during EPA's April 1, 2008, inspection of the Facility. This staining is apparent in photos P40110010 and P40110011 from Camera 1.
- D. **Severstal Response to March 15, 2010 Information Request:** As to whether Severstal "performed any sampling in or around stained soils, either inside the fence of or adjacent to the Plant 1 electrical substation," Severstal is continuing to search its records to determine whether it may have performed any such sampling. As noted in Severstal's July 3, 2008 response, with regard to alleged soil staining outside the fence and adjacent to the transformers referred to in item 28 of USEPA's May 29, 2008 information request, and in reviewing the photos provided by Ohio EPA, including photos P40110010 and P40110011 from Camera 1, and despite Severstal's subsequent investigation of this location, Severstal has been unable to locate or identify any stained soil outside the substation fenced area.

#### **Item #29**

- A. **May 29, 2008 Information Request:** Given the reported exceedances in emissions from the galvanizing baghouse, provide details on the potential for deposition of dust on the Severstal property and surrounding areas, as well as risks identified with respect to such deposition.
- B. **Severstal Response July 3, 2008:** The request contained in item 29 of USEPA's May 29, 2008 information request is vague and unclear. Item 29 refers to "reported exceedances from the galvanizing baghouse," but does not identify specific exceedances, any standards that were allegedly exceeded, or the particular substances about which USEPA

is seeking information. To the extent that USEPA is requesting information, generally, about any analysis or studies concerning “the potential for deposition of dust” from the galvanizing baghouse on Severstal’s property or surrounding areas, Severstal is unaware that any such analysis or studies exist or that any “risks” have been “identified with respect to such deposition.”

- C. **March 15, 2010 Information Request:** Provide the information requested. Your response provides no requested information. EPA did not limit its request to formal studies or analyses. Information may come from sources including any document, as well as the knowledge or belief of any of your employees with relevant information.
- D. **Severstal Response to March 15, 2010 Information Request:** Severstal again notes that USEPA’s request is vague and unclear. Without information from USEPA as to what “reported exceedances” it is referring to, it is impossible for Severstal to know what information USEPA is seeking.

In further response and in an effort to provide the responsive information that USEPA appears to be seeking, Severstal is unaware of, and despite a diligent search of its records, has been unable to locate or identify any document or information about any analysis or studies concerning “the potential for deposition of dust” from the galvanizing baghouse on Severstal’s property or surrounding areas, or that any “risks” have been “identified with respect to such deposition.” Severstal is unaware of any documents or information regarding the deposition of galvanizing baghouse dust on the Martins Ferry plant property or surrounding properties.

Severstal has found that, on occasion, dust residues may fall on the roof surrounding the exhaust stack and are subsequently flushed from the roof to the WWTP sump during storm events. Any such dust residues flushed to the WWTP sump are then removed from the wastewater and become WWTP sludge, which is appropriately disposed of.

#### **Item #30**

- A. **May 29, 2008 Information Request:** During the inspection on March 31, 2008, when inspecting the galvanizing baghouse area, the group was splashed with drippage from the baghouse stack, which was a yellow color. Numerous drips of this material were noted on the concrete adjacent to the stack (See photo from Camera 1, P3310001). Regarding this material, has any testing been done to identify it? If so, provide a copy. Has any effort been made to identify the extent of the area which has been impacted by the drippage? Provide any supporting documents.
- B. **Severstal Response July 3, 2008:** With reference to the “yellow color” material referred to in item 30 of USEPA’s May 29, 2008 information request, Severstal believes that this material is a non-hazardous waste identified by Severstal as “Galvanizing Baghouse Cleanout.” On regular occasions, the baghouse modules are cleaned out, which generates a material similar to what USEPA describes in item 30. This cleaning generates “Galvanizing Baghouse Cleanout.” Further, Severstal has inspected the location described in item 30 and has removed the “drips” referred to for appropriate disposal.

- C. **March 15, 2010 Information Request:** Provide the information requested. Your response provides no information regarding any testing of the yellow drippage or efforts to identify the impacted area.
- D. **Severstal Response to March 15, 2010 Information Request:** Severstal previously informed USEPA that it has identified the “yellow color” materials referred to in item 30 of USEPA’s May 29, 2008 information request as a non-hazardous waste known as “Galvanizing Baghouse Cleanout.” The basis for this identification is generator knowledge. Galvanizing Baghouse Cleanout has previously been tested for waste determination purposes prior to disposal. See Attachment 5 to Severstal’s July 3, 2008 response.

In further response, as Severstal previously informed USEPA, Severstal inspected the location described in item 30, determined that the material observed was Galvanizing Baghouse Cleanout, and removed the “drips” referred to for appropriate disposal. Severstal identified the impacted area based on visual inspection and removed it to a “visually clean” standard. Severstal does not believe that further investigation is warranted.

**Item #s 31-38**

**A. May 29, 2008 Information Request:**

1. Item #31: Regarding the 4,000 gallon gasoline underground storage tank (UST), provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST.
2. Item #32: Regarding the old gasoline UST located in the same general vicinity, provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST. Provide copies of all reports provided to regulatory agencies (e.g. BUSTR) regarding this UST. Particular detail should be provided to support the assertion in Reference 26 (Attachment 2) that petroleum-based contamination in groundwater is naturally attenuating. The current status of groundwater remediation should be discussed, including the frequency and extent of the bailing and monitoring program, and plans to install soil vapor extraction and/or air sparging operations (as mentioned in Reference 21 in Attachment 2).
3. Item #33: Provide a list, description, and map identifying the location of all groundwater supply and groundwater monitoring wells located at the Martins Ferry facility and on adjacent properties, and all well surveys that have been completed. Provide a list of all abandoned wells located on the site and the reason for abandonment.
4. Item #34: Provide the most recent three (3) years of groundwater monitoring data for all monitoring wells at or adjacent to the Martins Ferry facility. Identify the

location of monitoring wells that are currently being sampled on a map. City of Martins Ferry Municipal Water Authority wells should also be noted on the map. Additionally, provide a summary of historic monitoring results for all wells that are currently in use or that have been abandoned.

5. Item #35: Provide a geologic cross-section diagram for the Martins Ferry facility.
6. Item #36: Provide the most recent water level data and/or groundwater contour maps for the Martins Ferry facility, along with information on any seasonal or historical variations in the groundwater elevations.
7. Item #37: Provide information on any Martins Ferry facility procedures used to identify and close unused or abandoned wells and the history of any wells that are currently operating or have been disclosed on site.
8. Item #38: Provide any available data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.

- B. Severstal Response July 3, 2008:** Items 31 through 38 of USEPA's May 29, 2008 information request seek information regarding virgin petroleum underground storage tank issues which are exempt from RCRA regulation, and are instead regulated by the State of Ohio Department of Commerce, Division of State Fire Marshal, Bureau of Underground Storage Tank Regulations ("BUSTR"). As such, Severstal objects to USEPA's requests for information contained in items 31 through 38. USEPA's May 29, 2008 information request does not cite any legal authority that supports its request for the information sought in items 31 through 38. Moreover, to the extent that that information may be publicly available information (e.g., "reports provided to regulatory agencies (e.g., BUSTR)," USEPA may easily obtain that information from such sources.

In further response, Attachment 17 is a copy of the relevant No Further Action letter from Kelly J. Gill, Corrective Action Supervisor for the Ohio Department of Commerce, Division of State Fire Marshall, Bureau of Underground Storage Tank Regulations.

- C. March 15, 2010 Information Request:** Provide the information requested. Your response provides no information requested. Your response also mischaracterizes both the relevant law and facts. EPA has authority under Section 3007 of RCRA to request information regarding materials leaking from underground storage tanks (USTs), where those wastes such as gasoline may contain hazardous waste constituents. The Ohio Department of Commerce's regulation of USTs pursuant to an EPA-approved program under Subchapter IX of RCRA does not pre-empt federal regulation of hazardous waste. In fact, RCRA explicitly provides that EPA may continue to enforce those UST regulations. See Section 9006 of RCRA, 42 U.S.C. § 6991e. Accordingly your assertion that USTs are exempt from RCRA regulation is incorrect. Nor may you refuse to response to a Section 3007 information request because EPA may be able to obtain the requested information from an alternative source.

Additionally, only requests 31 and 32 ask for information regarding underground storage tanks. You have articulated no basis for withholding information to requests 33-38.

- D. Severstal Response to March 15, 2010 Information Request:** Severstal maintains and does not waive its previous objections, as noted in its July 3, 2008 response. Severstal is surprised that USEPA is expending valuable resources in what appears to be an effort to duplicate Ohio's previous detailed evaluation of subsurface issues at the Martins Ferry facility associated with USTs.

In further response,

1. In response to USEPA's Item #31 ("Regarding the 4,000 gallon gasoline underground storage tank (UST), provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST."), Severstal responds as follows:

Severstal has provided documents containing information that may be responsive to USEPA's item 31. See **Attachment 31**.

2. In response to USEPA's Item #32 ("Regarding the old gasoline UST located in the same general vicinity, provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST. Provide copies of all reports provided to regulatory agencies (e.g. BUSTR) regarding this UST. Particular detail should be provided to support the assertion in Reference 26 (Attachment 2) that petroleum-based contamination in groundwater is naturally attenuating. The current status of groundwater remediation should be discussed, including the frequency and extent of the bailing and monitoring program, and plans to install soil vapor extraction and/or air sparging operations (as mentioned in Reference 21 in Attachment 2)."), Severstal responds as follows:

Severstal has provided documents containing information that may be responsive to USEPA's item 32, including copies of reports and other documentation provided to BUSTR and/or OEPA. See **Attachment 32**. As Severstal informed USEPA in its July 3, 2008 response, Severstal received a No Further Action letter from the BUSTR program for this UST. Groundwater remediation has been completed and no further action is underway or planned.

3. In response to USEPA's Item #33 ("Provide a list, description, and map identifying the location of all groundwater supply and groundwater monitoring wells located at the Martins Ferry facility and on adjacent properties, and all well surveys that have been completed. Provide a list of all abandoned wells located on the site and the reason for abandonment."), Severstal responds as follows:

Severstal is unaware of the existence of any currently operational groundwater supply wells located at the Martins Ferry facility. Severstal has located information concerning a groundwater well not currently in use. See **Attachment 33**. See **Attachment 32** for descriptions and maps of groundwater monitoring wells located at the Martins Ferry plant. See **Attachment 34** for information concerning wells that may be located on adjacent properties (no property lines are

shown). Severstal has been unable to locate any documents or information concerning “abandoned wells located on the site and the reason for abandonment.”

4. In response to USEPA’s Item #34 (“Provide the most recent three (3) years of groundwater monitoring data for all monitoring wells at or adjacent to the Martins Ferry facility. Identify the location of monitoring wells that are currently being sampled on a map. City of Martins Ferry Municipal Water Authority wells should also be noted on the map. Additionally, provide a summary of historic monitoring results for all wells that are currently in use or that have been abandoned.”), Severstal responds as follows:

See **Attachment 32** for information and documents concerning groundwater monitoring data from groundwater monitoring wells located at the Martins Ferry plant.

5. In response to USEPA’s Item #35 (“Provide a geologic cross-section diagram for the Martins Ferry facility.”), Severstal responds as follows:

Severstal could not locate any geologic cross-section diagram in its records for the Martins Ferry facility.

6. In response to USEPA’s Item #36 (“Provide the most recent water level data and/or groundwater contour maps for the Martins Ferry facility, along with information on any seasonal or historical variations in the groundwater elevations.”), Severstal responds as follows:

See **Attachment 32**.

7. In response to USEPA’s Item #37 (“Provide information on any Martins Ferry facility procedures used to identify and close unused or abandoned wells and the history of any wells that are currently operating or have been disclosed on site.”), Severstal responds as follows:

See response to item 32, above; Severstal is unaware of information concerning any closed or abandoned wells at the Martins Ferry plant. See **Attachment 32** for information concerning groundwater monitoring wells that have been disclosed on site.

8. In response to USEPA’s Item #38 (“Provide any available data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.”), Severstal responds as follows:

Severstal is unaware of the existence of any data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.

**Attachments to Severstal's April 8, 2010 response  
to USEPA's March 15, 2010 information request\***

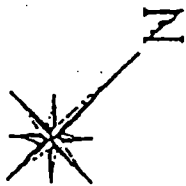
- 18 – Revised version of former Attachment 9 showing solid waste generation locations
- 19 – 2004 SPPP Map
- 20 – 2007 SPPP
- 21 – Martins Ferry Incident Report, 9/19/2007
- 22 – Environmental Incident Report, 9/12/2005
- 23 – Environmental Incident Report, 1/15/2003
- 24 – Environmental Incident Report, 7/24/2002
- 25 – Environmental Incident Report, 11/14/2001
- 26 – Environmental Incident Report, 1/9/2001
- 27 – 1/10/2001 Email
- 28 – Written Release Notification to OEPA, 10/12/2007
- 29 – Wheeling Pittsburgh Steel Corp. Interoffice Correspondence, 10/31/1988
- 30 – Safety-Kleen sample results
- 31 – BUSTR Program records for “4,000 gallon gasoline UST”
- 32 – BUSTR Program records for “oil gasoline UST”
- 33 – Water Withdrawal Facility Registration Annual Report Form
- 34 – City of Martin's Ferry's Drinking Waste Source Protection Plan notes and maps

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\* These attachments were previously provided to USEPA on April 8, 2010 per the request of George Hamper. We have not enclosed them again with this response.

Mixed Sources  
www.fsc.org Cert no. SW-COC-00280  
FSC C 1506 Forest Stewardship Council



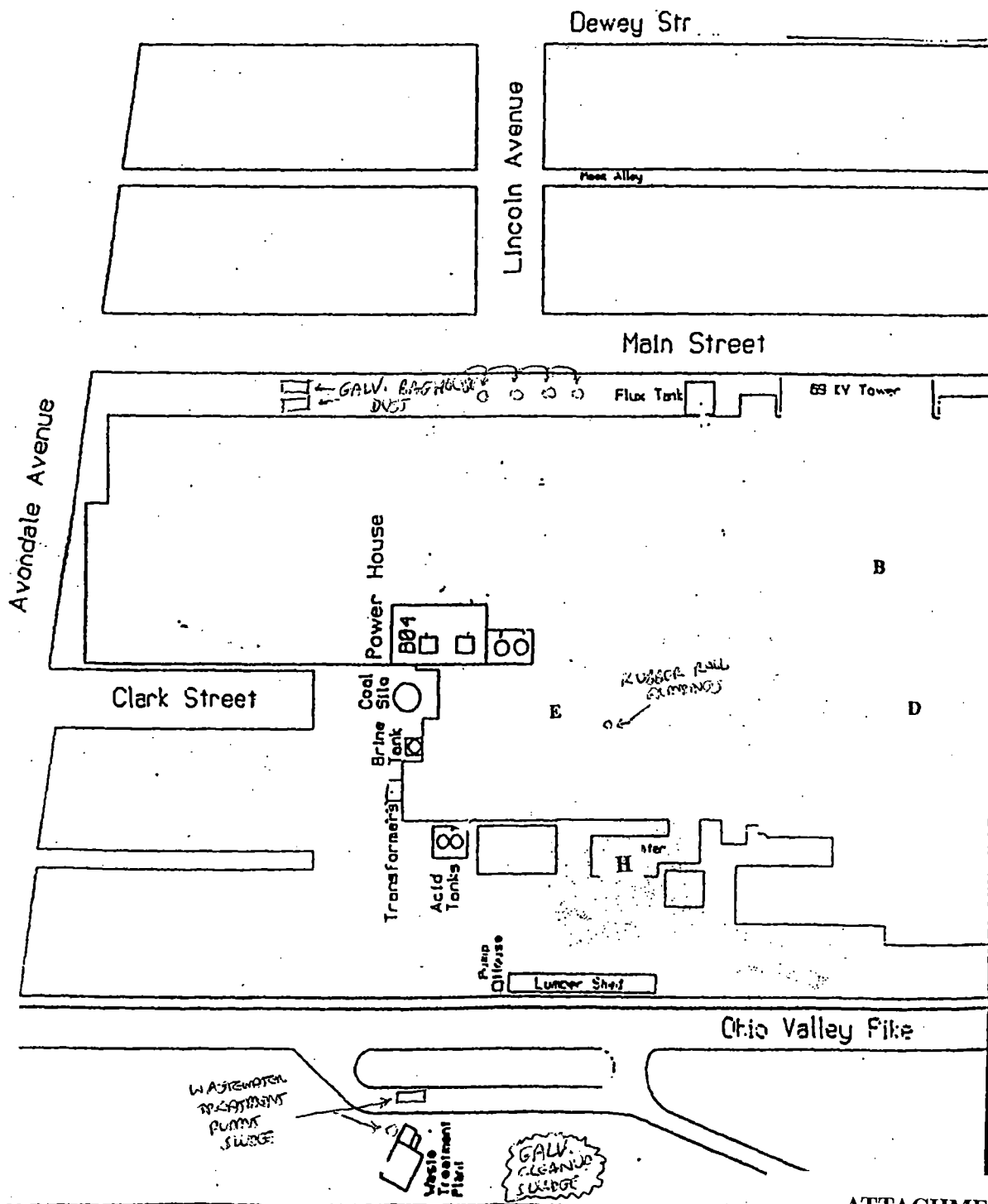


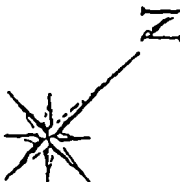
Att #90  
Att #18

- A - 48" Galvanizing Line
- B - 36" Galvanizing Line
- C - 60" Galvanizing Line
- D - Electric Shop
- E - Machine Shop
- F - Oil House
- G - Chemtreat Rolloff Box Staging Area
- H - Paint House

Figure 1, p. 1

Marlins Ferry Plant	
1001 Main Street Marlins Ferry Ohio, 43935	
Date	Scale
	1" = 130'

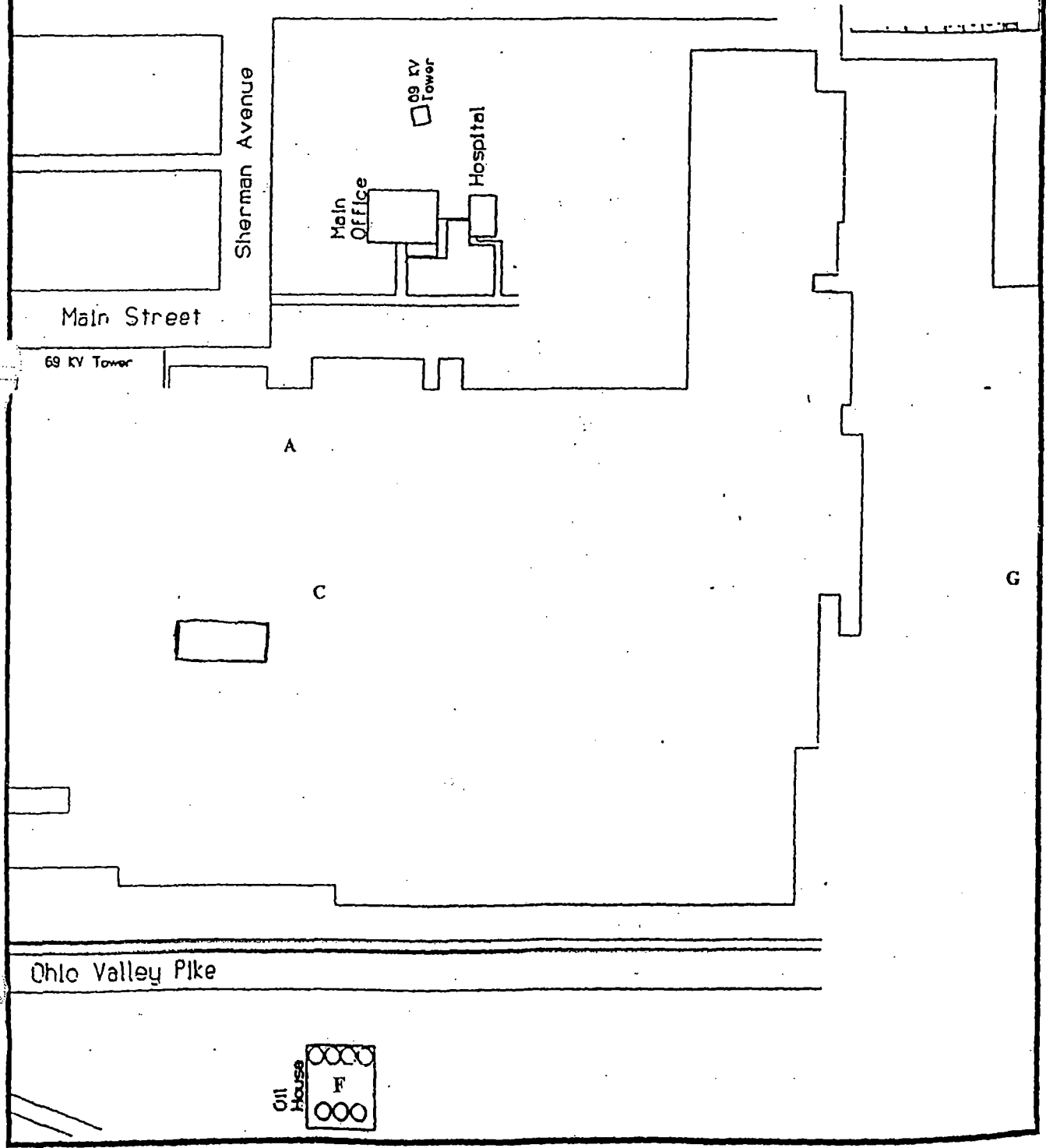




- A - 48" Galvanizing Line
- B - 36" Galvanizing Line
- C - 60" Galvanizing Line
- D - Electric Shop
- E - Machine Shop
- F - Oil House
- G - Chemtreat Rolloff Box Staging Area
- H - Paint House

Figure 1, p.2

Martins Ferry Plant	
1001 Main Street	
Martins Ferry	
Ohio, 43935	
Date	Scale
	1" = 130'



SCMF 5.5.2  
copy



## **Martins Ferry Plant**

1001 Main Street  
Martins Ferry, OH 43935  
Phone: 304-234-7219  
Ohio River Mile: # 87.8

## **Storm Water Pollution Prevention Plan**

Original: August 16<sup>th</sup>, 2004  
Revised: August 15, 2007 by WPSC

Original Prepared by: Amendola Engineering, Inc., Westlake, OH

2007 Revision Prepared by: Wheeling-Pittsburgh Steel Corp.

## TABLE OF CONTENTS

<u>DESCRIPTION</u>	<u>PAGE NUMBER</u>
<b>INTRODUCTION</b>	3
<b>GENERAL FACILITY DESCRIPTION</b>	3
<b>SWPPP RESPONSIBILITIES</b>	4
<b>STORM WATER POLLUTION PREVENTION TEAM</b>	4
<b>PLAN CERTIFICATIONS</b>	5
 <b>SECTION A</b>	
Deadlines for Plan Preparation and Compliance	6
 <b>SECTION B</b>	
Signature and Plan Review	6
 <b>SECTION C</b>	
Keeping Plan Current	6
 <b>SECTION D</b>	
Storm Water Pollution Prevention Plan	6
1 Pollution Prevention Team	6
2 Description of Potential Pollution Sources	6
3 Measures and Controls	7
4 Comprehensive Site Compliance Evaluation	8
5 Requirements for storm water discharges to Municipal Separate Storm Water Systems (MS4s)	9
6 Consistency with other plans	9
7 Additional requirements for SARA Section 313 Water Priority Chemicals	9
8 Salt Storage Requirements	11
 <b>SECTION E</b>	
Operation and Maintenance Schedules	11
 <b>SECTION F</b>	
Storm Water Discharge Monitoring Requirements	11
 <b>ATTACHMENT 1</b>	
Inventory of Exposed Materials	
<b>ATTACHMENT 2</b>	
Spills and Leaks	
<b>ATTACHMENT 3</b>	
Summary of Potential Pollution Sources and BMPs	
<b>ATTACHMENT 4</b>	
Site Compliance Evaluation Form	
<b>ATTACHMENT 5</b>	
Training Sheet	
 <b>FIGURE 1</b>	
Site Map	

## INTRODUCTION

This Storm Water Pollution Prevention Plan (SWPPP or Plan) has been developed pursuant to NPDES permit No. 0IC00020\*DD Part IV, to minimize contamination of storm water discharges from Wheeling Pittsburgh Steel Corporation's Martins Ferry Plant. The contents of this plan are consistent with requirements specified in Part IV Section D of the applicable NPDES permit and with the Ohio EPA Consent Order of Preliminary Injunction of August 2003. The Plan is organized to facilitate implementation of storm water pollution prevention activities identified herein.

## GENERAL FACILITY DESCRIPTION

The Plant galvanizes (applies zinc coatings to) flat rolled steel strip and sheet produced at other Wheeling Pittsburgh facilities. Operations include acid cleaning, alkaline cleaning, hot dip coating, and ancillary activities. Storm water associated with industrial activity is discharged to the Ohio River. Outfalls at the Plant are listed in Table 1:

**Table 1**  
**Outfall Summary**

<b>Outfall</b>	<b>Location</b>	<b>Description</b>
001	40° 05' 55" N; 80° 42' 37" W	Treated process wastewaters and storm water from the Plant's southern area.
002	40° 06' 10" N; 80° 42' 32" W	Storm water from Plant's central area and storm water from the City of Martins Ferry.
003	40° 06' 17" N; 80° 42' 32" W	Storm water from the Plant's abandoned Plant No. 1. <b>Plugged and abandoned August/September 2004.</b>
004	40° 06' 18" N; 80° 42' 30" W	Storm water from abandoned Plant No.1. <b>Plugged and abandoned July 2004.</b>
005	40° 06' 19" N; 80° 42' 30" W	Storm water from abandoned Plant No.1; city storm water. <b>All sewer laterals from WPSC sealed Dec. 7, 2005.</b>

## SWPPP RESPONSIBILITIES

Task	Responsible Person	Frequency
Site Compliance Evaluation, including: <ul style="list-style-type: none"> <li>- West side of Plant 2 including baghouse area</li> <li>- East side of Plant 2 including lumber shed area</li> <li>- Plant 2 general area</li> <li>- Area in between Plant 1 and 2</li> <li>- East of Ohio Valley Pike and Wastewater Treatment Plant area</li> <li>- Note these inspections include section 313 chemical piping inspections and section 313 chemical storage/handling area inspections.</li> </ul>	WPSC Env. Control Dept.	Annual
Employee Training	WPSC Env. Control Dept	Annual
Operation and Maintenance Schedule <ul style="list-style-type: none"> <li>- Catch Basin Cleaning</li> </ul>	Services Manager - Environmental & Services	Semi-Annual

## STORM WATER POLLUTION PREVENTION TEAM

Name	Position	Responsibilities
Jon P. Lewis Phone: 740-317-3312	Services Manager - Environmental & Services	Ensure day to day BMPs are implemented
Tom Waligura Phone: 304-234-2682	Manager, WPSC Environmental Control	Ensure Plan is updated as necessary
Wayne Pysh Phone: 304-312-0125	Engineer- Martins Ferry Finishing Operations	Update drawings, coordinate any structural projects that may be necessary.
Al Schell Phone: 304-234-7253	Area Manager Maintenance - Galvanize	Ensure day to day BMPs are implemented
Leonard Vinci Phone: 304-234-7200	Division Manager	Certify that Plan will be implemented

## PLAN CERTIFICATIONS

### Plant Management Certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Division Manager:

Leonard J. Vinci  
Leonard J. Vinci

9-6-07  
Date

### Non-storm water discharge certification:

Outfall 002 was inspected during dry weather on 10/14/03 by Thomas J. Waligura. Flow was not observed in Outfall 002. Outfall 001 contains process wastewater.

Director, Environmental  
Control Department:

Bud E. Smith  
Bud E. Smith

8-31-07  
Date

### Professional Engineer's Certification:

I hereby certify and attest that I am familiar with the facility and the information contained in this plan and that to the best of my knowledge and belief such information is true, complete and accurate. Further, this plan has been prepared in accordance with good engineering practices.

Thomas J. Waligura  
Thomas J. Waligura

41392  
Registration Number

8-15-07  
Date

## **A. DEADLINES FOR PLAN PREPARATION AND COMPLIANCE**

This Plan was prepared and submitted to Ohio EPA before September 1, 2004, in accordance with the Ohio EPA Consent Order of Preliminary Injunction. The Plant implemented this Plan upon submittal to Ohio EPA.

## **B. SIGNATURE AND PLAN REVIEW**

See **PLAN CERTIFICATIONS** for signature in accordance with 40 CFR 122. This plan shall be maintained at the Martins Ferry Plant and shall be made available upon request to Ohio EPA, USEPA or the municipality.

## **C. KEEPING PLAN CURRENT**

This Plan shall be amended to reflect changes to Plant design, construction, operation or maintenance that can have a significant effect on the potential for the discharge of pollutants. The Plan will also be amended if it is determined to be ineffective at minimizing pollutant discharges from identified potential pollution sources.

## **D. STORM WATER POLLUTION PREVENTION PLAN**

### **D.1. Pollution Prevention Team**

The storm water pollution prevention team is identified at the front of this plan.

### **D.2. Description of Potential Pollution Sources**

#### **D.2.a. Drainage**

A site map showing the outline of outfall drainage areas is provided as Dwg # 3-50060. Storm water from the Plant's south side is treated at the Plant's process wastewater treatment system and is subsequently discharged to the Ohio River via Outfall 001. Storm water from central plant areas is discharged to the Ohio River via Outfall 002. The majority of the Plant No. 1 has been demolished to its foundations. The Outfall 003 sewer was plugged in August 2004 and the Outfall 004 sewer was also plugged in July 2004 and no longer discharges storm water from the abandoned "Plant No. 1" area to the Ohio River. All sewer laterals from the northern most area of abandoned "Plant No. 1" were plugged by Dec 7, 2005. Only storm water from the City of Martins Ferry is now discharged to the Ohio River via the outfall that was numbered as 005. The types of pollutants likely to be present in the Outfall 002 storm water discharge include suspended solids, oil and grease and metals, particularly zinc. Flows with significant potential to cause erosion have not been identified at the Plant.



#### **D.2.b. Inventory of Exposed Materials**

An inventory of exposed materials is provided as Attachment 1.

#### **D.2.c. Spills and Leaks**

A list of significant spills and leaks that were exposed to storm water is provided as Attachment 2.

#### **D.2.d. Sampling Data**

Storm water sampling is conducted quarterly and submitted to Ohio EPA with the plant's Discharge Monitoring Reports. Copies are maintained at the Maintenance Office and WPSC Corporate offices and are available for review.

#### **D.2.e. Risk Identification and Summary of Potential Pollution Sources**

A summary of potential pollution sources is provided as Attachment 3.

#### **D.3. Measures and Controls**

Measures and controls (Best Management Practices) appropriate for identified potential pollution sources are listed in Attachment 3. Good housekeeping, preventive maintenance, spill response, inspections, training, and record keeping are addressed as follows:

##### **D.3.a.b. and d. Good housekeeping, preventive maintenance, and inspections**

Good housekeeping and preventive maintenance items are listed as BMPs, in Attachment 3, where judged appropriate. Inspections are conducted as part of the site compliance evaluation. Records of inspections are maintained at WPSC's Corporate offices and are available for review. Follow-up actions from the inspections will be documented in the site compliance evaluation report.

##### **D.3.c. Spill prevention and response**

Areas where potential spills can occur are identified in Attachment 3 as potential pollution sources. Spill response procedures are identified in the Plant's SPCC Plan and Hazardous Waste Contingency Plan. Spill response portions of these plans are incorporated into the SWPPP by reference.

##### **D.3.e. Employee training**

Training for storm water pollution prevention is conducted for selected employees at the frequency listed in the **SWPPP RESPONSIBILITIES** section, near the front of this plan. Spill response, applicable NPDES permit requirements, and good housekeeping and

BMPs are addressed during storm water training. A form that can be used for documenting storm water training is provided as Attachment 5.

#### **D.3.f. Record keeping and internal reporting procedures**

Information and records regarding significant spills or unauthorized discharges, and preventive maintenance and inspections will be available for review from WPSC's Corporate offices.

#### **D.3.g. Non-storm water discharges**

Significant non-storm water flows at the Plant include process wastewaters from galvanizing operations (e.g. steel cleaning rinsewaters), non-contact cooling water and boiler blowdown. These flows are routed to the Plant's wastewater treatment system and are subsequently discharged via Outfall 001. Certification that Outfall 002 has been evaluated for the presence of non-storm water discharges is provided in the **PLAN CERTIFICATIONS** section of this plan.

#### **D.3.h. Sediment and Erosion Control**

Flows with significant potential to cause erosion have not been identified at the Plant. If future construction activities present significant potential for erosion from storm water, BMPs will be evaluated and implemented at that time, as appropriate.

#### **D.3.i. Management of Run-Off**

Storm water from the Plant's southern areas, where most industrial activity is located, is treated at the Plant's wastewater treatment system prior to discharge to the Ohio River via Outfall 001.

### **D.4. Comprehensive Site Compliance Evaluation**

A comprehensive site compliance evaluation will be conducted as scheduled in the **SWPPP RESPONSIBILITIES** section of this plan. A comprehensive site compliance evaluation will be conducted at least annually. An example form for completing the evaluation is provided as Attachment 4. Each area listed in the **SWPPP RESPONSIBILITIES** section of this plan will be inspected, and a form will be completed for each identified area. The evaluation will consist of the following:

- A visual inspection of all potential pollution sources for evidence of, or the potential for, pollutants entering the storm water drainage system.
- Inspection of storm water management controls (dikes, berms, etc.) to ensure they are functioning properly.

- Inspection of equipment needed to implement the plan, such as spill response equipment.
- Changes to the description of potential pollution sources or management controls as a result of the evaluation must be made within two weeks, and corrective actions must be implemented within twelve weeks.
- A written report summarizing the evaluation, personnel making the evaluation, the dates of the evaluation, major observations relating to implementation of the SWPPP, and any corrective actions. The report will be maintained at WPSC Corporate offices for three years, and will be available for review. The report will be certified in accordance with the statement under "Plant Management Certification" at the front of this plan.

**D.5. Additional Requirements for storm water discharge through MS4s serving a population of 100,000 or more.**

The City of Martins Ferry does not serve a population of greater than 100,000 people. The Plant intends to comply with requirements of municipal storm water management programs, if notified of such requirements by the municipality.

**D. 6. Consistency with other plans**

This plan is consistent with the Plant's SPCC Plan and hazardous waste contingency plan. Spill response measures of those plans have been incorporated by reference under section D.3. *Measures and Controls*.

**D.7. Additional requirements for SARA Section 313 Water Priority Chemicals**

The Plant is subject to SARA Section 313 reporting for the water priority chemicals below:

- Ammonia
- Hydrochloric Acid
- Chromium
- Lead
- Zinc

**D.7.a. Appropriate containment, drainage control or diversionary structures**

Appropriate containment, drainage control or diversionary structures are provided as follows for Section 313 water priority chemical storage, processing or handling:

**Table 2**  
**Appropriate containment, drainage control or diversionary structures**

<b>Chemical</b>	<b>Location/Usage/Storage, etc.</b>	<b>Appropriate containment, drainage control or diversionary structures</b>
Ammonia	Zn Ammonium Chloride storage tank	Secondary containment
	Zn Ammonium Chloride unloading	Connection for unloading truck is within diked area.
	Used flux totes at WWTP	Area drains to WWTP
HCl	HCl Storage Tank	Secondary containment; area drains to WWTP
	Loading area	Material is available to neutralize spill; area drains to WWTP; wastewater can be diverted to holding tank.
Chromium	WWTP sludge	Lined roll-off bin; area drains to WWTP
	Chem treat waste	Lined roll-off bin w/cover; area is graveled
Lead	WWTP sludge	Lined roll-off bin; area drains to WWTP
	Baghouse dust	Area drains to WWTP
	Used batteries	Stored under cover or inside building
Zinc	Galvanizing Lines	Inside processing building
	WWTP sludge	Lined roll-off bin; area drains to WWTP
	Baghouse dust	Baghouse area drains to WWTP. Baghouse dust placed in roll-off box within curbed area that drains to WWTP. Fork lift truck moves dust container within fence line off of street.
	Zinc waste from galvanizing pots	Containerized; Area drains to WWTP
	Chem treat waste	Lined roll-off bin w/cover; area is graveled
	Zinc bricks	Stored under cover at lumber shed

#### **D.7.b. Guidelines for Section 313 Water Priority Chemicals**

##### **D.7.b.1. Liquid Storage Areas**

Containers for storage of liquid Section 313 Water Priority Chemicals are compatible with the material stored and the conditions of storage. Refer to Table 2 for appropriate measures to minimize discharge of Section 313 Water Priority Chemicals from liquid Section 313 Water Priority Chemical storage.

##### **D.7.b.2. Material Storage Areas**

Refer to Table 2 for appropriate measures to minimize discharge from material storage areas containing Section 313 Water Priority Chemical that may be subject to run-off leaching or wind blowing.

##### **D.7.b.3. Truck and Railcar Loading and Unloading Areas for Liquid Section 313 Water Priority Chemicals**

Refer to Table 2 for appropriate measures to minimize discharges from truck and/or railcar loading and unloading areas for liquid Section 313 Water Priority Chemicals.

#### **D.7.b.4. Areas where Section 313 Water Priority Chemicals are Transferred Processed or Otherwise Handled**

Materials used for piping and equipment are compatible with substances handled. Visual inspections of overhead piping conveying Section 313 Water Priority Chemicals are inspected as listed in the **SWPPP RESPONSIBILITIES** section of this plan. Refer to Table 2 for appropriate measures to minimized discharges of Section 313 water priority chemicals from areas where Section 313 Water Priority Chemicals are transferred processed or otherwise handled.

#### **D.7.b.5. Discharges from areas described in Items 1, 2, 3 and 4.**

As noted in Table 2 storm water from areas where water priority chemicals are handled is treated at the Plant's wastewater treatment system.

#### **D.7.b.6. Discharges from areas not described in Items 1, 2, 3 and 4.**

Not applicable. See Item D.7.b.5.

#### **D.7.b.7. Preventive Maintenance and Housekeeping**

Inspections of areas with potential for leaks, spills or other releases of Section 313 Water Priority Chemicals are conducted in accordance with the **SWPPP RESPONSIBILITIES** section of this plan. Corrective actions are taken as soon as practicable, as necessary.

#### **D.7.b.8. Facility Security**

The Plant is completely fenced. Entrance gates are guarded. Gates are locked when the Plant is not operating.

#### **D.7.b.9. Training**

Storm water training is conducted when listed in the **SWPPP RESPONSIBILITIES** section of this plan. Contractors will be informed of preventive practices used at the Plant. Training includes matters of pollution prevention with regard to Section 313 Water Priority Chemicals. Spill response is coordinated by the Services Manager - Environmental & Services.

#### **D.8. Additional Requirements for Salt Storage**

The Plant does not maintain a salt pile.

#### **E. OPERATION AND MAINTENANCE SCHEDULES**

Operation and maintenance schedules for storm water pollution prevention are listed in the **SWPPP RESPONSIBILITIES** section of this plan.

#### **F. STORM WATER DISCHARGE MONITORING REQUIREMENTS**

Storm water will be monitored in accordance with the Plant's NPDES Permit.

**Wheeling Pittsburgh Steel Corporation  
Martins Ferry Plant  
SWPPP**

**Attachment 1 - Inventory of Exposed Materials**

<b>Exposed Material</b>	<b>Location</b>	<b>Potentially Affected Outfalls</b>	<b>Method of Storage, Disposal or Handling</b>	<b>Description of Material Management Practices/Structural and Non-Structural Controls/Storm Water Treatment</b>
WWTP Sludge Filter Cake	WWTP	001	Pile and roll-off box(es)	Area drains to WWTP. Sealed roll-off box w/liner. Frequently hauled.
Acid waste from clean-out of steel cleaning tanks	Plant 2 - Acid Waste Storage Area	001	Roll-off box	Sealed roll-off box w/liner. Oil-dry added to absorb water as needed.
Alkaline waste from clean-out of steel cleaning tanks	Plant 2 -Alkaline Waste Storage Area	001	Roll-off box	Sealed roll-off box w/liner. Oil-dry added to absorb water as needed.
Zinc waste (skimmings) from galvanizing pots	Plant 2 - East Side	001	Open containers	Area drains to WWTP
Chem Treat waste	Plant 1 - Chem Waste Storage Area	002	Roll-off box	Covered and lined roll-off box. Box is stored away from stormwater drains.
Trash Dumpsters	Throughout Plant	001, 002	Dumpsters/roll-off boxes	Frequently hauled
Removed Baghouse Bags	Plant 2 - Southwest side of Plant	001	Roll-off box	During maintenance of baghouse, used bags are removed and placed in covered roll-off box located within curbed area. Storm drainage from curbed area is directed to the WWTP.
Baghouse Dust	Plant 2 - Southwest side of Plant	001	Roll-off box	Covered and lined roll-off box. Frequently hauled.

Wheeling Pittsburgh Steel Corporation  
Martins Ferry Plant  
SWPPP

Attachment 2 - Significant Spills and Leaks

Date	Spill	Leak	Location Observed	Type of Material	Quantity	Source, If Known	Reason	Response Procedures and Preventive Measures
2007								
NONE								
2006								
NONE								
2005								
NONE								
2004								
NONE								
2003								
01/14/2003	X		Storeroom	Mercury	3 lbs.	Unknown	Believe related to storeroom fire of Dec. 2002	Cleaned up by Weavertown Env. on 1/16/03
2002								
NONE								
2001								
01/09/2001	X		Oil House	Chem Treat (Chromate)	320 gallons	tote	Tierlift dropped tote of Chem Treat by oil house.	Vacuum truck cleanedup area and flushed sewer lines.



**Wheeling Pittsburgh Steel Corporation  
Martins Ferry Plant  
SWPPP**

**Attachment 3 - Potential Pollution Sources**

Potential Pollution Source/Area	Location	Potential Pollutant Parameters	Best Management Practices	Potentially Affected Outfall
<b>Loading and Unloading Operations</b>				
Zn Ammonium Chloride unloading	Plant 2 - East Side	Zn, Ammonia	Secondary containment for tank. Fill connection is within diked area. Catch Basins on Outfall 002 sewer system are cleaned twice per year.	002
Used Zn Ammonium Chloride loading	WWTP	Zn, Ammonia	Area drains to WWTP. Catch Basins on Outfall 001 sewer system are cleaned twice per year.	001
HCl unloading	Plant 2 - East Side	depressed pH	Area drains to WWTP	001
Lime silo loading	WWTP	elevated pH	Area drains to WWTP	001
Oil loading and unloading areas are incorporated from the Plant's SPCC Plan by reference.				

**Outdoor Storage Activities**

Zinc waste from galvanizing pots	Plant 2 - East Side	Zn	Area drains to WWTP. Catch Basins on Outfall 001 sewer system are cleaned twice per year.	001
WWTP sludge filter cake	WWTP	metals, tss	Area drains to WWTP	001
Empty drum storage area (lumber yard)	Plant 2 - East Side	oil and grease, organics	Area drains to WWTP; under cover. Catch Basins in area are cleaned twice per year.	001
HCl storage tanks	Plant 2 - East Side	depressed pH	Area drains to WWTP	001
			Secondary containment for tanks	
Zn Ammonium Chloride Storage Tank	Plant 2 - West Side	Zn, Ammonia	Secondary containment for tank Catch Basins on Outfall 002 sewer system are cleaned twice per year.	002
Lime silo	WWTP	elevated pH	Area drains to WWTP	001
Brine storage tank	Plant 2 - West Side	TDS	Area drains to WWTP	001

**Wheeling Pittsburgh Steel Corporation  
Martins Ferry Plant  
SWPPP**

**Attachment 3 - Potential Pollution Sources**

Potential Pollution Source/Area	Location	Potential Pollutant Parameters	Best Management Practices	Potentially Affected Outfall
Used Zn Ammonia Chloride (Totes)	WWTP	Zn, Ammonia	Area drains to WWTP	001
Zinc brick storage	Lumber shed	Zn	Stored under roof; area drains to WWTP. Catch Basins on Outfall 001 sewer system are cleaned twice per year.	001
Chem Treat Waste Area	Between Plants 1 and 2	metals, tss	Waste stored in lined roll-off box and covered with tarp. Area is remote to sewer system. Catch Basins on Outfall 002 sewer system are cleaned twice per year.	002
Acid/Alkaline Waste Storage (roll-off boxes brought on-site as necessary)	East of Ohio Valley Pike	metals, depressed or elevated pH	Waste stored in lined roll-off box and covered with tarp or sealed Frac Tanks; area drains to WWTP	001
			Area is graveled to prevent run-off	
Liquid Frac (Baker) tank used for various cleanup projects within mill	WWTP	metals, depressed or elevated pH	Area drains to WWTP	001
Oil storage areas and tanks are incorporated from the Plant's SPCC Plan by reference.				

***Outdoor Manufacturing or Processing Activities***

Fork Lift Maintenance	Plant 2 - East Side	oil and grease	Spill response. Catch Basins on Outfall 002 sewer system are cleaned twice per year.	002
-----------------------	---------------------	----------------	--	-----

***Significant Dust or Particulate Generating Processes***

Baghouse	Plant 2 - West Side	Zn, TSS	Area drains to WWTP. Curbing to direct stormwater flow away from street. Catch Basins on Outfall 001 sewer system are cleaned twice per year.	001
----------	---------------------	---------	---	-----

**Wheeling Pittsburgh Steel Corporation  
Martins Ferry Plant  
SWPPP**

**Attachment 3 - Potential Pollution Sources**

Potential Pollution Source/Area	Location	Potential Pollutant Parameters	Best Management Practices	Potentially Affected Outfall
Plant 2 Roadways and roof drainage	Plant 2	TSS, metals	Roadway near baghouse swept three days per week. Curbing added to prevent dust from entering street. Fork lifts move baghouse dust to roll-offs located within curbed area. Fork lifts do not enter street with baghouse dust.	001 and 002
			Ohio Valley Pike drainage along Plant 2 is treated at WWTP	
			Catch Basins on Outfalls 001 and 002 sewer systems are cleaned twice per year.	
			Majority of roof drainage treated at WWTP	

***On-site Waste Disposal Practices***

There are no on-site waste disposal practices. Potential pollution sources related to on-site waste management are listed elsewhere in this attachment.

**(EXAMPLE FORM)**

**WHEELING-PITTSBURGH STEEL CORPORATION  
MARTINS FERRY PLANT  
Site Compliance Evaluation Form**

**STORMWATER POLLUTION PREVENTION CHECKLIST**

Inspected By:

Date:

WPSC Personnel:

Area:

Answer the following questions. If the answer to a question is yes, explain.

**A. General Cleaning**

Mark Y (yes) or N (no)

1. Do areas need swept or cleaned?
2. Do you see any corroded drums or drums without plugs or cores?
3. Do you see any corroded or damaged tanks, tank supports and tank drain valves?
4. Do you see any torn bags of materials or bags exposed to rainwater?
5. Do the roadways need swept?
6. Is there any evidence of dust or dry chemicals on the ground from industrial processes?
7. Is there any loose material or garbage laying around?

**B. Material Storage**

1. Are there any raw materials stored outside or exposed to stormwater?
2. Are there any drums not stored on pallets?

### **C. Preventive Maintenance**

1. Are there any leaking pumps and/or hose connections?
2. Are there any cracks in secondary containment dikes?
3. Are any drainage valves to secondary containment open or leaking?
4. Is there any substantial accumulation of material or oil in any catch basin?
5. Is there any spillage from any conveyor system causing a buildup of material?

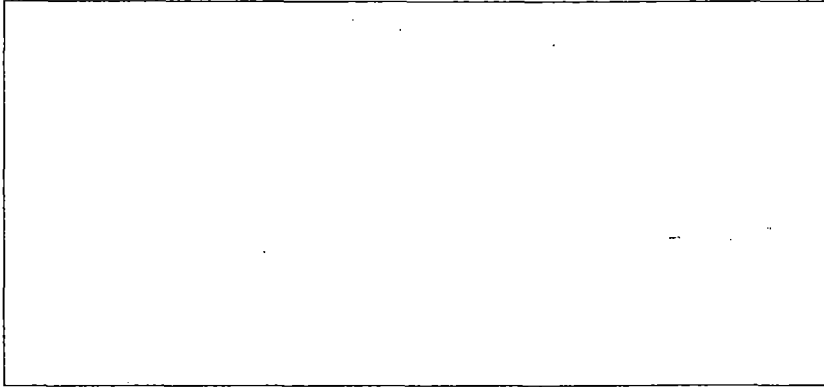
### **D. Loading and Unloading Procedures**

Inspect all locations where loading and unloading take place.

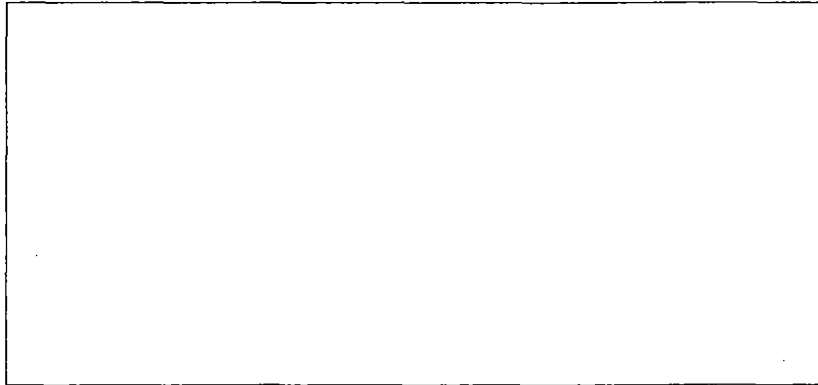
(loading/unloading areas include barges, railroad cars, tank trucks, front-end loaders, liquid storage tanks, material storage areas, baghouse dust bins, sludge roll-off boxes, and vehicle fueling stations).

1. Is there any evidence of spillage on the ground?

**Major Observations:**



**Corrective actions and any potential pollution sources or BMPs that need to be added to the SWPPP:**



**Plant Management Certification**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Plant Manager: \_\_\_\_\_

Date: \_\_\_\_\_

**Wheeling-Pittsburgh Steel Corporation  
Martins Ferry Plant  
Attachment 5  
Employee Training**

<b>Date:</b>				
<b>Training Topics</b>		<b>Brief Description of Training</b>		<b>Attendees</b>
1	Permit Requirements			
2	Good housekeeping			
3	Preventive Maintenance			
4	Visual inspections			
5	Spill Prevention and Response			
6	Sediment and Erosion Control			
7	Management of Runoff			

1.1.5.3.3

Modified By Schell, Alfred

Martins Ferry Incident ID 191		
Type <input type="checkbox"/> Malfunction <input checked="" type="checkbox"/> Spill <input type="checkbox"/> By-Pass <input type="checkbox"/> Other		
Reported by Badge 755 Schell		
Name of Person Reported to Al Schell		
Incident Date & Time 9/19/2007 09:20		
Phone Number of person reporting 304-234-7253		
Date & Time Reported to EC? 9/19/2007 10:00 Duration of incident? 3 Hours		
Name of person in EC? Pat Smith		
Location <input type="checkbox"/> 36" Galv. Line <input type="checkbox"/> 60" Fume Scrubber <input type="checkbox"/> Wastewater Treatment (Check all that apply) <input type="checkbox"/> 48" Galv. Line <input type="checkbox"/> 36" & 48" Fume Scrubber <input type="checkbox"/> Outfall 001 <input type="checkbox"/> 60" Galv. Line <input type="checkbox"/> Holding Tank System <input type="checkbox"/> General <input type="checkbox"/> Galv. Baghouse <input type="checkbox"/> Influent Sump <input checked="" type="checkbox"/> Other North Truck Staging		
Cause of Incident <input type="checkbox"/> Mechanical Failure <input type="checkbox"/> Instrument Failure <input type="checkbox"/> Unknown (Check all that apply) <input type="checkbox"/> Material Failure <input type="checkbox"/> Computer Failure <input checked="" type="checkbox"/> Other Driver sideswiped pole		
Description of Incident Driver was leaving the scale area and sideswiped exit east guard pole. This in turn ruptured his passenger side fuel tank. He proceeded about another 60 yds to the staging area and got out to check damages when he found the tank was leaking.		
Spill Quantity 35 <input checked="" type="checkbox"/> Gallons <input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Spill Contained <input type="checkbox"/> Released to Water/Sewer 35 Amt Recovered as Product <input checked="" type="checkbox"/> Released to Soil <input type="checkbox"/> Released to Air <input type="checkbox"/> Oil/Sheen on River		
Spilled Material <input type="checkbox"/> Hydrochloric Acid <input type="checkbox"/> Gasoline <input type="checkbox"/> Caustic (Check all that apply) <input type="checkbox"/> PCBs <input checked="" type="checkbox"/> Diesel <input type="checkbox"/> Oil <input type="checkbox"/> Mercury <input type="checkbox"/> Hazardous Waste <input type="checkbox"/> Other		
Response Action <input type="checkbox"/> Shut Down <input type="checkbox"/> Equipment Repair <input type="checkbox"/> None Required (Check all that apply) <input type="checkbox"/> Boom Deployed <input checked="" type="checkbox"/> Cleanup <input type="checkbox"/> Other		
Additional Information I had mechanic proceed to truck and we used a portable pump to empty the ruptured tank into 55 gal drums approx 120 gal.) Had labors use absorbant to clean up what had leaked to the ground. Clean up material placed in plastic bags and tagged for later disposal thru proper channels Note area had recently be sprayed with dust suppressant and surface was sealed preventing any abosorption in to the ground.		
Followup Recommendation <input type="checkbox"/> New/Mod. Procedure <input type="checkbox"/> Engineering Study <input type="checkbox"/> Change Design <input type="checkbox"/> Training (Check all that apply) <input type="checkbox"/> New/Modified Equipment <input type="checkbox"/> Discipline <input type="checkbox"/> Other		
Additional Information		
Finalized By Smith, Bud ( Only the Division Manager can Update this Section )		
Responsible Badge 974 Vind		Priority MEDIUM
Date Due	Date Completed 9/19/2007	<input checked="" type="checkbox"/> Final Completion (can only be checked by the EC Director)

ATTACHMENT 21



05-SEP-15

04:04

FROM-WPSC Mingo Jet Environmental/Utilities

1-740-283-5779

T-904

P.001/001 F-316

WPSC - Martins Ferry Plant

ECMF 1.1.5.3.3

## ENVIRONMENTAL INCIDENT REPORT (MF001)

1	Type	<input type="checkbox"/> Malfunction	<input checked="" type="checkbox"/> Spill	<input type="checkbox"/> By-Pass	<input type="checkbox"/> Other
2	Who reported it?	JON LEWIS	To whom?	JIM LEWIS	When? Date 9/15/05 Time 3:00pm
3	Phone number of person reporting:	504 234 7327	When reported to EC?	Date 9/15/05 Time 3:00pm	Duration of incident? 10 MINUTES Hours
4	To whom in EC?	Jim Lewis			
5	Location	<input type="checkbox"/> 36" Galv. Line <input type="checkbox"/> 48" Galv. Line <input type="checkbox"/> 60" Galv. Line <input type="checkbox"/> Galv. Baghouse	<input type="checkbox"/> 60" Fume Scrubber <input type="checkbox"/> 36" & 48" Fume Scrubber <input type="checkbox"/> Holding Tank System <input type="checkbox"/> Influent Sump	<input type="checkbox"/> Wastewater Treatment <input type="checkbox"/> Outfall 001 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	
6	Cause of Incident	<input type="checkbox"/> Mechanical Failure <input type="checkbox"/> Material Failure	<input type="checkbox"/> Instrument Failure <input type="checkbox"/> Computer Failure	<input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Other SPILL	
7	Description of Incident	AN MC 42 OIL TOTE WAS OVERFILLED SOUTH OF MACHINE SHOP			
8	Spill Quantity	(Enter amount spilled) 15 GAL Circle Gallons or Pounds Amount Recovered as Product (GAL or lbs)	(Check all that apply) <input checked="" type="checkbox"/> Spill Contained <input type="checkbox"/> Released to Soil <input type="checkbox"/> Released to Water/Sewer <input type="checkbox"/> Released to Air		
9	Spilled Material	<input type="checkbox"/> Hydrochloric Acid <input type="checkbox"/> Caustic <input checked="" type="checkbox"/> Oil <input type="checkbox"/> Mercury	<input type="checkbox"/> Gasoline <input type="checkbox"/> Diesel <input type="checkbox"/> PCBs <input type="checkbox"/> Hazardous Waste	<input type="checkbox"/> Other	
10	Response Action	<input type="checkbox"/> Shut Down <input type="checkbox"/> Basin Deployed	<input type="checkbox"/> Equipment Repair <input checked="" type="checkbox"/> Cleanup	<input type="checkbox"/> None Required <input type="checkbox"/> Other	
11	Additional Information	CLEANED UP WITH FLOOR DRY AND DISPOSED OF.			
ATTACHMENT 22					
12	Followup Recommendation	<input type="checkbox"/> New/Mod. Equipment <input type="checkbox"/> Training <input type="checkbox"/> Change Procedure <input type="checkbox"/> Discipline <input type="checkbox"/> Other			
13	Division Manager's Signature	[Signature]			
14	Followup Recommendation	[Signature]			
15	Resolved: Date	[Date]			

NOTE: Return copy of completed form to Bud Smith - Director, Environmental Control, Fax No. (304) 234-2813

g:\iso\whrelease\formseachplant\mf001 EIR form-1.xls

Sent to Bud Smith  
by Tom Waligura on  
9/15/05 @  
1610 hrs.

Revision: New

ECMF 1.1.5.3.3

1	Type	<input type="checkbox"/> Malfunction	<input checked="" type="checkbox"/> Spill	<input type="checkbox"/> By-Pass	<input type="checkbox"/> Other	
2a	Who reported it?	<u>A. Smith</u>		To whom?	<u>W. J. Doe</u>	
	Phone number of person reporting:	<u>(304) 234-7250</u>				
2b	When reported to EC?	Date	Time	Duration of Incident?	Hours	
		<u>1-15-03</u>	<u>10:00 AM</u>			
	To whom in EC?	<u>Pvt. Smith</u>				
3	Location					
	(Check all that apply)	<input type="checkbox"/> 35" Galv. Line	<input type="checkbox"/> 65" Fume Scrubber	<input type="checkbox"/> Wastewater Treatment		
		<input type="checkbox"/> 48" Galv. Line	<input type="checkbox"/> 35" & 48" Fume Scrubber	<input type="checkbox"/> Outfall 001		
		<input type="checkbox"/> 60" Galv. Line	<input type="checkbox"/> Holding Tank System	<input type="checkbox"/> General		
		<input type="checkbox"/> Galv. Baghouse	<input type="checkbox"/> Influent Pump	<input checked="" type="checkbox"/> Other	<u>Storeroom</u>	
4	Cause of Incident					
	(Check all that apply)	<input type="checkbox"/> Mechanical Failure	<input type="checkbox"/> Instrument Failure	<input type="checkbox"/> Unknown		
		<input type="checkbox"/> Material Failure	<input type="checkbox"/> Component Failure	<input checked="" type="checkbox"/> Other	<u>Fire Damage</u>	
5	Description of Incident	<u>Found Small Area of Mercury On Floor In Storeroom While Cleaning Up Fire Damage (BSP)</u>				
6a	Spill Quantity					
	(Enter amount spilled)	<u>3 lb. Est.</u>		(Check all that apply)		
		Circle: Gallons or Pounds		<input checked="" type="checkbox"/> Spill Contained	<input type="checkbox"/> Released to Water/Sewer	
		Amount Recovered as Product (Gal or lbs)		<input type="checkbox"/> Released to Soil	<input type="checkbox"/> Released to Air	
6b	Spilled Material					
	(Check all that apply)	<input type="checkbox"/> Hydrochloric Acid	<input type="checkbox"/> Gasoline	<input type="checkbox"/> Other		
		<input type="checkbox"/> Caustic	<input type="checkbox"/> Diesel			
		<input type="checkbox"/> Oil	<input type="checkbox"/> PCBs			
		<input checked="" type="checkbox"/> Mercury	<input type="checkbox"/> Hazardous Waste:			
6c	Response Action					
	(Check all that apply)	<input type="checkbox"/> Shut Down	<input type="checkbox"/> Equipment Repair	<input type="checkbox"/> None Required		
		<input type="checkbox"/> Boom Deployed	<input checked="" type="checkbox"/> Cleanup	<input type="checkbox"/> Other		
	Additional Information	<u>Had Area Tied Off. Contact W. J. Doe. Area Is All Clear. Re. Of 11:30 AM PM 1-16-03.</u>				
7	Followup Recommendation					
	(Check all that apply)	<input type="checkbox"/> New/Mod. Procedure	<input type="checkbox"/> Engineering Study	<input type="checkbox"/> New/Modified Equipment	<input type="checkbox"/> Other	
		<input type="checkbox"/> Training	<input type="checkbox"/> Change Design	<input type="checkbox"/> Discipline		
	Additional Information	<u>Problem Was Due To Fire Damage.</u>				
8	Division Manager's Signature	<u>[Signature]</u>			Date	<u>1-16-03</u>
		(Print)			<u>Mark D. Lee</u>	
9	Followup Recommendation	Division Manager's Signature			Date	
	Resolved Date:					

NOTE: This release is made pursuant to E.O. 13526, 68 FR 52959, 9/18/03. E.O. 13526, 68 FR 52959, 9/18/03. Control. Fax No. (804) 234-2813.

Revision: New

ATTACHMENT 23

\*\* TOTAL PAGE.02 \*\*  
 \*\* TOTAL PAGE.01 \*\*

# ENVIRONMENTAL INCIDENT REPORT - MARTINS FERRY

7-24-00

1 Type ☐ Malfunction ☒ Spill ☐ By-Pass ☐ Other

2a. Who reported it? Al SCHILL To whom? Bill Polomik When? Date 7-24-00 Time 4:50 PM

2b. When reported to EC? Date 7-24-00 Time 4:50 Duration of incident? 3 Hours

3 Location (Check all that apply)

<input type="checkbox"/> 36" Galv. Line	<input type="checkbox"/> 60" Fume Scrubber	<input checked="" type="checkbox"/> Wastewater Treatment
<input type="checkbox"/> 48" Galv. Line	<input type="checkbox"/> 36" & 48" Fume Scrubber	<input type="checkbox"/> Outfall 001
<input type="checkbox"/> 60" Galv. Line	<input type="checkbox"/> Holding Tank System	<input type="checkbox"/> General
<input type="checkbox"/> Galv. Baghouse	<input type="checkbox"/> Influent Sump	<input type="checkbox"/> Other

4 Cause of Incident (Check all that apply)

<input type="checkbox"/> Mechanical Failure	<input type="checkbox"/> Instrument Failure	<input type="checkbox"/> Personal Injury	<input type="checkbox"/> Unknown
<input type="checkbox"/> Material Failure	<input type="checkbox"/> Computer Failure	<input type="checkbox"/> Equipment Damage	<input checked="" type="checkbox"/> Other <u>OPERATOR FROM VAC TRUCK</u>

5 Description of Incident MPW VAC TRUCK WAS UNLOADING WATER & SOAP FROM CLEANING (NO ENTRY AS THEY WERE OFF LOADING INTO HOLDING TANK. THEY EMPTIED PARTIAL LOAD ON GROUND

6a. Spill Quantity (Check all that apply)

<input checked="" type="checkbox"/> 1000 Gallons	<input checked="" type="checkbox"/> Spill Contained	<input type="checkbox"/> Released to Water/Sewer
<input type="checkbox"/> Pounds	<input checked="" type="checkbox"/> Released to Soil	<input type="checkbox"/> Released to Air
Amount Recovered as Product (G/P)		

6b. Spilled Material (Check all that apply)

<input type="checkbox"/> Hydrochloric Acid	<input type="checkbox"/> Gasoline	<input checked="" type="checkbox"/> Other <u>WATER</u>
<input checked="" type="checkbox"/> Caustic Oil 5%	<input type="checkbox"/> Diesel	<u>95%</u>
<input type="checkbox"/> Mercury	<input type="checkbox"/> PCBs	
	<input type="checkbox"/> Hazardous Waste:	

7a. Corrective Action (Check all that apply)

<input type="checkbox"/> Shut Down	<input type="checkbox"/> Equipment Repair	<input type="checkbox"/> None Required
<input type="checkbox"/> Boom Deployed	<input checked="" type="checkbox"/> Cleanup	<input type="checkbox"/> Other

Additional Information HAD MPW VAC. ENTIRE AREA INCLUDING TOP OF SOIL STAINED BY WATER AND OIL FILM

7b. Followup Action (Check all that apply)

<input type="checkbox"/> New/Mod. Procedure	<input type="checkbox"/> Engineering Study	<input type="checkbox"/> New/Modified Equipment	<input checked="" type="checkbox"/> Other
<input type="checkbox"/> Training	<input type="checkbox"/> Change Design	<input type="checkbox"/> Discipline	

Additional Information CONTACTED SUPERVISION FOR MPW AND TALKED TO THEM ABOUT THE INCIDENT.

8 Division Manager's Signature Mark O'Leary Date 7-25-00

(Print)

9 Follow-up Action Division Manager's Signature \_\_\_\_\_ Date \_\_\_\_\_

Completion Date: \_\_\_\_\_ (Print)

NOTE: Return copy of completed form to Todd Koget - Environmental Engineer @ SS12

ATTACHMENT 24

To: Larry Benaschi @ 7215

To: Environmental  
CMF 1.1.5.3

## WPSC ENVIRONMENTAL INCIDENT REPORT - MARTINS FERRY

1	Type	<input type="checkbox"/> Malfunction	<input checked="" type="checkbox"/> Spill	<input type="checkbox"/> By-Pass	<input type="checkbox"/> Other
2a.	Who reported it?	H.B. Strickland			
	Phone number of person reporting:	5148			
2b.	When reported to EC?	Date	Time	Duration of incident?	Hours
		11/14/01	2:15	N.K.	
	To whom in EC?	Tom Wiegman			
3	Location	<input type="checkbox"/> 34" Galv. Line	<input type="checkbox"/> 60" Fume Scrubber	<input type="checkbox"/> Wastewater Treatment	
	(Check all that apply)	<input type="checkbox"/> 48" Galv. Line	<input type="checkbox"/> 38" & 49" Fume Scrubber	<input type="checkbox"/> Outfall 001	
		<input type="checkbox"/> 60" Galv. Line	<input type="checkbox"/> Holding Tank System	<input checked="" type="checkbox"/> General	OUTSIDE
		<input type="checkbox"/> Galv. Baghouse	<input type="checkbox"/> Influent Sump	<input checked="" type="checkbox"/> Other	SE corner of
4	Cause of Incident	<input checked="" type="checkbox"/> Mechanical Failure	<input type="checkbox"/> Instrument Failure	<input type="checkbox"/> Unknown	OIL MIST
	(Check all that apply)	<input type="checkbox"/> Material Failure	<input type="checkbox"/> Computer Failure	<input type="checkbox"/> Other	
5	Description of Incident	Plug Leaking on tote 1743 Quaker Chemical LC00157			
6a.	Spill Quantity	(Enter amount spilled)	(Check all that apply)	on ASPHALT PAV	
	21 GAL	Circle: Gallons or Pounds	<input checked="" type="checkbox"/> Spill Contained	<input type="checkbox"/> Released to Water/Sewer	
		Amount Recovered as Product (Gal or lbs)	<input type="checkbox"/> Released to Soil	<input type="checkbox"/> Released to Air	
6b.	Spilled Material	<input type="checkbox"/> Hydrochloric Acid	<input type="checkbox"/> Gasoline	<input type="checkbox"/> Other	ASOT / GROUND
	(Check all that apply)	<input type="checkbox"/> Caustic	<input type="checkbox"/> Diesel		
		<input type="checkbox"/> Oil	<input type="checkbox"/> PCBs		
		<input type="checkbox"/> Mercury	<input type="checkbox"/> Hazardous Waste:		
6c.	Response Action	<input type="checkbox"/> Shut Down	<input type="checkbox"/> Equipment Repair	<input type="checkbox"/> None Required	
	(Check all that apply)	<input type="checkbox"/> Boom Deployed	<input type="checkbox"/> Cleanup	<input type="checkbox"/> Other	
	Additional Information	Tighten plug to stop dripping			
7	Followup Recommendation	<input type="checkbox"/> New/Mod. Procedure	<input type="checkbox"/> Engineering Study	<input type="checkbox"/> New/Modified Equipment	<input type="checkbox"/> Other
	(Check all that apply)	<input type="checkbox"/> Training	<input type="checkbox"/> Change Design	<input type="checkbox"/> Discipline	
	Additional Information				
8	Division Manager's Signature	[Signature]		Date	11-15-01
		[Signature]			
9	Followup Recommendation	Division Manager's Signature		Date	
	Resolved Date:			(Print)	

NOTE: Return copy of completed form to Bud Smith - Director, Environmental Control, Fax No. (304) 234-2013  
ECMAGENERALRELEASEIR\_MFP.xls

10/26/01

INCIDENT NO. \_\_\_\_\_

ATTACHMENT 25

\*\* TOTAL PAGE.01 \*\*

\*\* TOTAL PAGE.01 \*\*



Mixed Sources

[www.fsc.org](http://www.fsc.org) Cert no. SW-COC-002980

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WPSC

ECMF 1.1.5.1

## ENVIRONMENTAL INCIDENT REPORT - MARTINS FERRY

1	Type	<input type="checkbox"/> Malfunction	<input checked="" type="checkbox"/> Spill	<input type="checkbox"/> By-Pass	<input type="checkbox"/> Other
2a.	Who reported it?	<u>C. Lofton</u> To whom? <u>L. Boock</u> When? Date <u>1-9-01</u> Time <u>11:30 AM</u>			
2b.	When reported to EC?	Date <u>1-9-01</u>	Time <u>11:55 AM</u>	Duration of incident?	Hours
3	Location (Check all that apply)	<input type="checkbox"/> 36" Galv. Line <input type="checkbox"/> 48" Galv. Line <input type="checkbox"/> 60" Galv. Line <input type="checkbox"/> Galv. Baghouse	<input type="checkbox"/> 60" Fume Scrubber <input type="checkbox"/> 36" & 48" Fume Scrubber <input type="checkbox"/> Holding Tank System <input type="checkbox"/> Influent Sump	<input checked="" type="checkbox"/> Wastewater Treatment <input checked="" type="checkbox"/> Outfall 001 <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <u>Oil House</u>	
4	Cause of Incident (Check all that apply)	<input type="checkbox"/> Mechanical Failure <input type="checkbox"/> Material Failure	<input type="checkbox"/> Instrument Failure <input type="checkbox"/> Computer Failure	<input type="checkbox"/> Personal Injury <input type="checkbox"/> Equipment Damage	<input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Other <u>Incorrect way of lifting specific tote</u>
5	Description of Incident	<u>Tierlift operator was unloading Oakite F-2 tote from delivery truck to the oil house storage area. As he was crossing railroad tracks near the oil house, he dropped the tote, releasing approx 320 Gal. of Chem Treat.</u>			
6a.	Spill Quantity (Check all that apply)	<input checked="" type="checkbox"/> Gallons <input type="checkbox"/> Pounds	<input checked="" type="checkbox"/> Spill Contained <input checked="" type="checkbox"/> Released to Soil	<input checked="" type="checkbox"/> Released to Water/Sewer <input type="checkbox"/> Released to Air	
6b.	Spilled Material (Check all that apply)	<input type="checkbox"/> Hydrochloric Acid <input type="checkbox"/> Caustic <input type="checkbox"/> Oil <input type="checkbox"/> Mercury	<input type="checkbox"/> Gasoline <input type="checkbox"/> Diesel <input type="checkbox"/> PCBs <input type="checkbox"/> Hazardous Waste:	<input checked="" type="checkbox"/> Other <u>Oakite F-2</u>	
7a.	Corrective Action (Check all that apply)	<input type="checkbox"/> Shut Down <input type="checkbox"/> Boom Deployed	<input type="checkbox"/> Equipment Repair <input checked="" type="checkbox"/> Cleanup	<input type="checkbox"/> None Required <input type="checkbox"/> Other	
	Additional Information	<u>C &amp; K Industrial Services - Vac. Company was called in to clean up the floor dry &amp; exposed soil &amp; pressure wash paved surfaces. The waste generated was properly disposed of in the Chem Treat roll-off box.</u>			
7b.	Followup Action (Check all that apply)	<input type="checkbox"/> New/Mod. Procedure <input checked="" type="checkbox"/> Training	<input type="checkbox"/> Engineering Study <input type="checkbox"/> Change Design	<input type="checkbox"/> New/Modified Equipment <input type="checkbox"/> Discipline	<input type="checkbox"/> Other
	Additional Information	<u>Employee involved in incident did go through forklift training but was not a regular operator in the department. On 1-10-01 all operators on 7-3 turn was shown a Video (OVER)</u>			
8	Division Manager's Signature	<u>Mark O'Leary</u> (Print) <u>Mark O'Leary</u>		Date	<u>1-10-00</u>
9	Follow-up Action	Division Manager's Signature <u>Mark O'Leary</u> (Print) <u>Mark O'Leary</u>		Date	<u>1-10-00</u>
	Completion Date:	<u>1-10-00</u>			

NOTE: Return copy of completed form to Todd Koget - Environmental Engineer @ 3312

ATTACHMENT 26

ECMF File 1.1.5.3

CMF GENERAL RELEASE COPY\_MFP.WK4

08/30/2000

INCIDENT NO. \_\_\_\_\_

7a. on (Forklift Safety Operation) From Industrial  
Safety Systems - Video No. 4040 by T. Petino &  
L. Starcher.



Mixed Sources

[www.fsc.org](http://www.fsc.org) Cert no. SW-COC-002980

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Lotus cc:Mail for Bud E. Smith

Author: Todd A. Koget at WPSCSS01

Date: 1/10/01 9:23 AM

Normal

TO: Mark P. Morelli at WPSCYK01, Mark W. O'Leary at WPSCAD01, Larry R. Boroski at WPSCMF01, Alfred E. Schell at WPSCMF01, Charles J. Reinacher at WPSCAD01

CC: Bud E. Smith at WPSCAD01, Patrick J. Smith at WPSCAD01, Thomas N. Pentino at WPSCMF01, Harry L. Page at WPSCAD01

Subject: MF Environmental Incident

----- Message Contents -----

ÚPn ZBû

At approximately 11:20AM yesterday (01/09/01), a Martins Ferry tierlift operator was unloading Chem Treat totes from a delivery truck. As he crossed a set of railroad tracks near the oil house, he dropped a tote. The tote split open when it hit the ground- releasing approximately 320 gallons of Chem Treat. Approximately 5 gallons of the Chem Treat was released to the soil (but was not absorbed due to the cold weather and frozen ground) with the remainder staying on paved surfaces. Plant personnel quickly used Floor Dry to block road sewers to prevent any releases to the WWTP and to absorb the Chem Treat. A neutralizer, manufactured by Oakite (makers of Chem Treat), was also used to neutralize the material. The area was "taped" off to prevent traffic from entering the spill site. C & K, a vac truck company, was called in to clean up the floor dry and exposed soil and pressure wash the paved surfaces. The waste generated from the cleanup was properly disposed of in the Chem Treat roll-off box. No agencies reports were required.

ATTACHMENT 27

24.5.5

PATRICK J. SMITH  
Environmental Engineer  
(740) 283-5542



October 12, 2007

Mr. Dennis Deavers  
Ohio EPA - SEDO  
2195 Front Street  
Logan, Ohio 43138-9031

**RE:           Written Release Notification  
              September 19, 2007 Oil (Diesel Fuel) Incident  
              Wheeling-Pittsburgh Steel Corporation  
              Martins Ferry Plant**

Dear Mr. Deavers:

This correspondence comprises the written release notification required by ORA rule 3750-25-25 for the incident reported to the Ohio EPA emergency response unit on September 19, 2007, report number 0709-07-3577. This incident occurred at the Wheeling-Pittsburgh Steel facility located in Martins Ferry, Ohio.

The incident involved a release of approximately 35 gallons of diesel fuel to the soil near the plant truck scale. The accident occurred when a non-WPSC truck ran off the scale and struck a nearby support, thereby puncturing his fuel tank. A portion of its contents was released to the surrounding soil there and a short distance away where the truck was moved following the incident. The released oil did not reach a sewer and, since it was spilled to an area covered by dust suppressant, was readily removed using absorbent materials.

If you have any questions regarding this submittal, please contact me at (740) 283-5542.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick J. Smith'.

Patrick J. Smith  
Environmental Engineer

cc:   Mr. Richard Quinlin  
      Belmont County EMA  
      68329 Bannock Road  
      St. Clairsville, OH 43950

ECSF  
ECMF 2.4.5.5



ATTACHMENT 28

INTEROFFICE CORRESPONDENCE

TO: R. E. Vogel

DATE: October 31, 1988

FROM: Safety Department

At 10:55 a.m., on October 18, 1988, I received a call that the Ohio EPA was at the gate requesting admittance to the plant.

I met with M. Moschell, Inspector, Division of Solid and Hazardous Waste Management and Steve Lind, Environmental Engineer, Division of Water Pollution Control.

I notified J. Matysiak & our Environmental Department.

The opening conference was held with R. Vogel, R. Byrne and myself. Tom Waligura joined us at approximately 11:25 a.m.

The visit was prompted by an employee complaint on October 11, 1988. The employee alleges unauthorized dumping on site at an area known as the "dump". The employee alleges the dumping of process tank sludge, then cleaning it up.

It was explained that flux tank sludge has been disposed of through the Waste Treatment Plant but because of the foam situation we are looking for another method of disposal. This material is non-hazardous.

It was explained that tower dust is being held in a container pending analysis before disposal.

It was explained that zinc dust is reclaimed by St. Joe Minerals.

All of the above removal is done by Valley Systems and it was explained that we have had problems between Union and Management concerning the use of this contractor.

We talked briefly about drum disposal. We explained that we do not give away our drums and that most of the drums are reclaimed and others are sent to our Steubenville Works for scrap.

At 11:45 a.m. T. Waligura, R. Byrne, the EPA and I visited the area known as the dump, located at the south end of the employee parking lot, northeast of the Waste Treatment Plant.

In conclusion, M. Moschell stated that they could see no evidence of recent dumping or excavation on site and they would reply to the complainant and send a copy to us.

At approximately 9:00 a.m., October 19, 1988, I discovered that an alkali tank on the 60" tank had been cleaned on October 11, 1988 and the material had been dumped in the south end of the employees' parking lot. Samples of the material were collected.

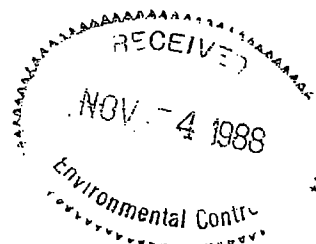
Tom Waligura notified M. Moschell of the Ohio EPA who asked for the analysis.

The material was cleaned up and placed in one of the plant dump trucks, tarped and parked on the north side of the Waste Treatment Plant pending the analysis.

*Christy*  
Christy Ballato  
Safety Supervisor

c.c. L. Boroski  
R. Plotz  
T. Waligura

ATTACHMENT 29





Mixed Sources

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Report Date: 20-Feb-2007  
Report: Premium Solvent

Generator:  
WHEELING PITS STEEL  
1001 MAIN STREET  
  
MARTINS FERRY, OH 43935

Control#: 2331915  
Survey: 6087989  
COMS Size:  
Model:

Safety-Kleen Service Representative / Branch Number :  
6984 CORDON COOPER / 414503

**Dear Customer:**

Please review the results of the analysis completed by Safety-Kleen Systems, Inc. on your sample. The sample submitted has **PASSED** the Safety-Kleen Premium Solvent Non-Hazardous Waste Screening Analysis.

The analysis does not show any targeted hazardous characteristics. As long as you do not mix the premium solvent with listed or characteristic hazardous waste, you may consider this waste stream to be a non-hazardous waste.

Please contact your local Safety-Kleen representative or branch facility listed above if you have any questions regarding this report, or if you require assistance with further testing.

<u>EPA Code</u>	<u>Parameter</u>	<u>Regulatory Limits</u>	<u>Result</u>	<u>Units</u>
D039	Tetrachloroethylene (Perc)	0.700	0.53	ug/mL
D040	Trichloroethylene (TCE)	0.500	0.43	ug/mL

Remarks:

Safety-Kleen Systems, Inc.  
Technical Center  
1502 East Villa Street  
Elgin, IL 60120  
Technical Support (800) 669-5840 Option 3

ATTACHMENT 30



Report Date: 20-Feb-2007  
Report: Premium Solvent

Generator :  
WHEELING PITTS STEEL  
1001 MAIN STREET  
  
MARTINS FERRY, OH 43935

Control#: 2331916  
Survey: 6087990  
COMS Size:  
Model:

Safety-Kleen Service Representative / Branch Number :  
6984 GORDON COOPER / 414503

**Dear Customer:**

Please review the results of the analysis completed by Safety-Kleen Systems, Inc. on your sample. The sample submitted has **PASSED** the Safety-Kleen Premium Solvent Non-Hazardous Waste Screening Analysis.

The analysis does not show any targeted hazardous characteristics. As long as you do not mix the premium solvent with listed or characteristic hazardous waste, you may consider this waste stream to be a non-hazardous waste.

Please contact your local Safety-Kleen representative or branch facility listed above if you have any questions regarding this report, or if you require assistance with further testing.

<u>EPA Code</u>	<u>Parameter</u>	<u>Regulatory Limits</u>	<u>Result</u>	<u>Units</u>
D039	Tetrachloroethylene (Perc)	0.700	<0.10	ug/mL
D040	Trichloroethylene (TCE)	0.500	0.11	ug/mL

Remarks:

Safety-Kleen Systems, Inc.  
Technical Center  
1502 East Villa Street  
Elgin, IL 60120  
Technical Support (800) 669-5840 Option 3



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**STATE OF OHIO  
WATER WITHDRAWAL  
FACILITY REGISTRATION  
ANNUAL REPORT FORM**

**SEND TO: OHIO DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF SOIL AND WATER RESOURCES  
WATER PLANNING PROGRAM  
2045 MORSE ROAD, BLD. B-2  
COLUMBUS, OHIO 43229-6693  
(614) 265-6938**

**AUTHORITY:** Ohio Revised Code Section 1521.16 requires that any owner of a facility, or combination of facilities, with the capacity to withdraw more than 100,000 gallons of water daily, register such facilities and file an annual report with the ODNR, Division of Soil and Water Resources.

# Water Withdrawal Report for the Year Ending December 31, 2009

**According to our records the Contact is listed as:**

### Please Make Corrections Below

Contact Name: JAMES LEWIS

BUD SMITH

Company Name: **WHEELING-PITTSBURGH STEEL CORP**

SEVERSTAL WHEELING, INC

Address: 1134 MARKET STREET

1134 MARKET STREET

WHEELING, WV 26003

WHEELING, WV 26003

Phone: 740/283-5873

304-234-2662

**Facility Owner:**

**Please Make Corrections Below**

(Notify us if facility ownership has changed)

Owner Name:

Company Name: WHEELING-PITTSBURGH STEEL CORP

SEVERSTAL WHEELING, INC.

Address: 1134 MARKET ST

1134 MARKET STREET

WHEELING WV 26003

WHEELING WV 26003

Phone: 740/283-5873

304-234-2662

**Facility Name and Withdrawal Mode:**

County: BELMONT

Registration Number: 01171

Facility Name: ~~WHEELING & PITTSBURGH STEEL~~ SEVERSTAL WHEELING, INC. - MARTINS FERRY

Registration Date: 1/1/1990

**Please note changes in facility status, or naming, in the gray spaces next to the well or intake number(s) below.**

[illegible]

# WITHDRAWALS

NOTE: This page may be photocopied if additional space is required. Please be sure to sign and date each copy.

## GROUND WATER (in Units of Millions of Gallons)

Registration Number 01171

SOURCE	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	TOTAL PER YEAR
WELL NO. 1	0	0	0	0	0	0	0	0	0	0	0	0	0
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
WELL NO.													
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	GRAND TOTAL 0
MAXIMUM	0	0	0	0	0	0	0	0	0	0	0	0	
MINIMUM	0	0	0	0	0	0	0	0	0	0	0	0	
DAYS IN OPERATION	0	0	0	0	0	0	0	0	0	0	0	0	TOTAL OPERATION DAYS 0

Are ground water withdrawal amounts based on metered readings? yes (no) (circle one) If "no," how were the reported withdrawal amounts determined?  
(Attach separate sheet, if necessary)

DID NOT OPERATE

## SURFACE WATER (in Units of Millions of Gallons)

SOURCE	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	TOTAL PER YEAR
INTAKE													
INTAKE													
INTAKE													
INTAKE													
INTAKE													
TOTAL													GRAND TOTAL
MAXIMUM													
MINIMUM													
DAYS IN OPERATION													TOTAL OPERATION DAYS

Are surface water withdrawal amounts based on metered readings? yes (no) (circle one) If "no," how were the reported withdrawal amounts determined?  
(Attach separate sheet, if necessary)

DID NOT OPERATE

## RETURN FLOW (in Units of Millions of Gallons)

SOURCE	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	TOTAL PER YEAR
FLOW	0	0	0	0	0	0	0	0	0	0	0	0	0
FLOW													
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	GRAND TOTAL 0

Are return flow amounts based on metered readings? yes (no) (circle one) If "no," how were the reported return flow amounts determined?  
(Attach separate sheet, if necessary)

DID NOT OPERATE

NOTE: Is the information originally supplied on your registration form still correct? yes (no) (circle one)

If "no," please attach a separate sheet indicating the nature of the change. If needed, a new registration form will be forwarded to you so that you may provide this office with the necessary revisions.

Owner or authorized representative's signature

*Bud E. Smith*

Date

2/16/2010

Bud E. Smith, Director, Environmental Control



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# **City of Martins Ferry's**

## **Drinking Water Source Protection Plan**

**Wednesday, July 18, 2006**

**5:30 PM**

- I. Welcome – Stanley Stein
  - A. Pledge of Allegiance
  - B. Attendees Introduction (Name & Agency)
  - C. Approval of Minutes (June 21)
- II. Topics For Discussion
  - A. Source Water Protection – Debra Prim (OEPA Specialist on Drinking Water)
  - B. Action Plan
  - C. Protective Strategies
    - 1. Public Involvement - (*Prevention*)
    - 2. Source Control Strategies – (*Prevention*)
    - 3. Contingency Plan – (*Response*)
    - 4. Ground Water Monitoring – (*Detection*)
  - D. Inner Protection Area
  - E. Outer Protection Area
  - F. Bridgeport – Martins Ferry Joint Project
- III. Old Business
  - A. Organization – 10 Members plus
  - B. Officers
    - 1. Chairperson – Stanley Stein
    - 2. Vice Chairperson – Justin Redinger
    - 3. Secretary – Christine Davis
  - C. Meeting Date – 3<sup>rd</sup> Tuesday of each month
- IV. New Business
  - A. Strategies
    - 1. Control of Potential Contaminant Sources
    - 2. Education and Outreach
  - B. Contingency Planning
    - 1. Spill Response
    - 2. Source Water Shortage
    - 3. Water Supply Planning
  - C. Ground Water Monitoring
  - D. Protection Plan Update
- V. Conclusion
  - a. Questions & Comments
  - b. Thank you for attending
- VI. Adjournment

## Potential Contaminant Sources

### Inner Circle (1 Year)

1. Transportation – Railways & Yards,  
River and State Route Seven
2. EORWA Lines & Pump - \_\_\_\_\_  
\_\_\_\_\_
3. Wheeling Pittsburgh Steel - \_\_\_\_\_  
\_\_\_\_\_
4. Above Ground Storage Tank - \_\_\_\_\_  
\_\_\_\_\_
5. Foundry/Metal Fabricator – \_\_\_\_\_  
\_\_\_\_\_

### Outer Circle (5 Year)

1. Transportation – Railways & Yards,  
and State Route Seven
2. Regulated Facility (EPA) - \_\_\_\_\_  
\_\_\_\_\_
3. Leaking Underground Tanks - \_\_\_\_\_  
\_\_\_\_\_
4. Brick Yard – \_\_\_\_\_  
\_\_\_\_\_
5. State of West Virginia – Line of \_\_\_\_\_  
Communication

### Outside of Circles

1. Hazardous Waste Handlers (RCRIS) - \_\_\_\_\_
2. Airborne Emissions (AIRS) - \_\_\_\_\_
3. Garage (Municipal) - \_\_\_\_\_
4. Fleet Truck Terminal - \_\_\_\_\_
5. Leaking Underground Tanks - \_\_\_\_\_
6. ODNR Oil & Gas Wells - \_\_\_\_\_
7. Cemetery - \_\_\_\_\_
8. Sewer Lines - \_\_\_\_\_
9. Railroads & Yards - \_\_\_\_\_
10. State Route 7 - \_\_\_\_\_

### Additions

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

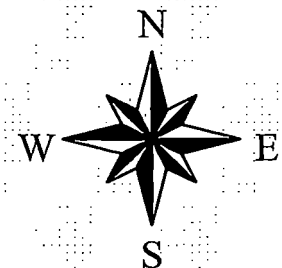
# Martin's Ferry Potential Contaminant Sources

## ● Well Locations

## Potential Contaminant Sources

- ▣ Above Ground Storage Tank
- ▲ Airborne Emissions (AIRS)
- Brick Plant
- †† Cemetery
- 🚚 Fleet Truck Terminal
- 🏭 Foundry/Metal Fabricator
- 🚚 Garage (Municipal)
- ▲ Hazardous Waste Handlers(RCRIS)
- ▣ Leaking Underground Tank
- ◎ Roads/Highways
- ▣ Print Shop
- ✕ Railroad
- Regulated Under Several EPA Programs
- ↗ Sewer Line
- ◎ Ohio River
- ⚡ ODNR Oil and Gas Wells

0.6 0 0.6 1.2 Miles



**Source Water Protection Plan Committee**

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Bus. Phone</b>	<b>Hm. Ph.</b>	<b>Cell Ph.</b>	<b>Appt. Date</b>	<b>E-Mail</b>
Applegarth, John	Teacher	521 N. 5th Street	Martins Ferry	Ohio	43935		633-2648		3/31/2006	
Davis, Kristine	Council Memer	304 N. 7th Street	Martins Ferry	Ohio	43935	(304)242-7751	633-0429		3/31/2006	davis304@sbcglobal.net
Duke, Edward L.	EMS Rep.	1100 Border Lane	Martins Ferry	Ohio	43935	699-4144	633-1808		3/31/2006	mfvfd@1st.net
Minder, Stanley E.	Water Superintendent	801 Elm Street	Martins Ferry	Ohio	43935	633-1378	633-5283		3/31/2006	mfwaterlab@1st.net
Prim, Debra	Ohio EPA	Front Street	Logan	Ohio		(740)380-5421				
Redinger, Joseph	Citizen	1101 Indiana Street	Martins Ferry	Ohio	43935	633-6324	633-2205		3/31/2006	JRED1101@sbcglobal.net
Redinger, Justin	Chamber of Commerce	1102 Indiana Street	Martins Ferry	Ohio	43935	633-6324	635-0937		3/31/2006	justin1102@sbcglobal.et
Rinderer, William	Fire Department Chief	608 Delaware Street	Martins Ferry	Ohio	43935	699-4145	633-1808	296-0116	3/31/2006	
Shrodes, Randy	Asst. Water Superintendent	1411 N. 9th Street	Martins Ferry	Ohio	43935	633-1378				
Smith, Bud	Dir. of Environmental Control	1134 Market Street	Wheeling	W.Va.	26003	(304)234-2662				
Stein, Stanley	Chairperson	402 Wagner Avenue	Bellaire	Ohio	43906	699-4152	676-9323	359-2925	3/31/2006	clsss402@1st.net
Stickley, Mark	Turfcare Supply	100 Picoma Road	Martins Ferry	Ohio	43935	633-5229				
Vinci, Leonard	Industry Rep.	1329 Kennedy Ave.	Martins Ferry	Ohio	43935	(304)234-7280	633-2325		3/31/2006	
West, Vincent F.	Safety & Service Dir.	1334 Roosevelt Ave.	Martins Ferry	Ohio	43935	699-4143	633-0786		3/31/2006	



March 23, 2006

Re: Source Water Protection Team Member

Dear :

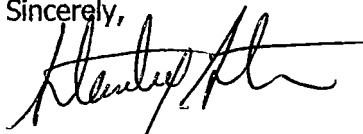
The City of Martins Ferry, under the direction of the Ohio Environmental Protection Agency (OEPA) is organizing a team to develop and implement a Drinking Water Source Protection Plan. OEPA Division of Drinking and Ground Waters has recently completed a Source Water Assessment for our City's wellfield. That report includes a map of our source water protection area, an inventory of potential contaminant sources identified within that area and an analysis of the susceptibility of our water supply to those contaminants.

Our job now is to create an action plan that will address the problems and risks identified in the assessment completed by OEPA. In order to succeed, we will need guidance from various knowledgeable members of the community. We are sending you this letter to formally invite you to participate in the development of our Source Water Protection Plan.

We plan to have a preliminary meeting on April 12, 2006, at 6:30 P.M. The meeting will be held at City Building Council Chambers on the second floor in Martins Ferry; we hope that you will be able to attend. A representative from OEPA will attend our first meeting to explain the program.

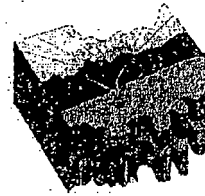
Should you have any questions regarding this letter please do not hesitate to contact Stanley Stein at (740)699-4152.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stanley Stein', written over a horizontal line.

Stanley Stein, Chairman  
Source Water Protection Team

# DRINKING WATER SOURCE ASSESSMENT for Martins Ferry Community Public Water Supply PWS ID #0701212



Protecting  
Ohio's Drinking  
Water Sources

OhioEPA

January 2003

**INTRODUCTION.** The 1996 Amendments to the Safe Drinking Water Act establish a program for states to assess the drinking water source for all public water systems. Ohio's Source Water Assessment and Protection Program is designed to help public water systems protect their sources of drinking water from becoming contaminated. This assessment:

- ▶ identifies the drinking water source protection area, based on the area that supplies water to the well(s);
- ▶ inventories the potential contaminant sources in the area;
- ▶ evaluates the susceptibility of the drinking water source to contamination; and
- ▶ recommends protective strategies.

The purpose of the assessment is to provide information that Martins Ferry Public Water Supply can use to help protect its source of drinking water from contamination.

**SYSTEM DESCRIPTION & GEOLOGY.** Martins Ferry Public Water Supply is a community public water system serving approximately 9,350 people in Martins Ferry, Ohio. This system operates 5 wells that pump approximately 2,707,760 gallons of water per day from a sand and gravel aquifer (water-rich zone) within the Ohio River Valley aquifer system. The aquifer is covered by approximately 18 feet of high-permeability material, which provides minimal protection from contamination. Depth to water in this aquifer is 30 to 35 feet below ground surface.

Soils in the area are silty loams which are moderately well-drained, meaning that much of the rainfall and snowmelt will infiltrate into the soil,

instead of running off or ponding. Topography in the area of the wellfield is generally flat. Ground water in this area is replenished by the gradual flow of water underground from higher to lower elevations and by approximately 9 inches per year of precipitation that infiltrates through the soil. At the Martins Ferry wellfield, ground water flows generally toward the southwest, based on the direction of flow in the Ohio River.

**PROTECTION AREA.** The drinking water source protection area for Martins Ferry Public Water Supply's wells is illustrated in Figure 1. This figure shows two areas, one inside the other. The "inner protection zone" is the area that provides ground water to Martins Ferry's wells within one year of pumping. A chemical spill in this zone poses a greater threat to the drinking water, so this area warrants more stringent protection. The "outer protection zone" is the additional area that contributes water when the wells are pumped for five years. Together, they comprise the drinking water source protection area.

### **Method Selection**

An analytic element model computer program called GFLOW was used to determine the areal extent of the protection area. Protection areas based on computer modeling can be significantly more credible than those produced by simpler methods, especially in areas with complex geology. The time and effort required to develop a computer model are warranted when the wellfield is located in a complex hydrogeologic setting, and the hydrogeologic data needed to run the program are available for the area. Both criteria were met for Martins Ferry Public Water Supply's source water assessment.

### **Model Set-up**

The GFLOW model for Martins Ferry Public Water Supply's wellfield was designed to simulate the characteristics of a sand and gravel buried valley aquifer that is bounded by a sandstone and shale bedrock aquifer. Figure 2 shows that the sand and gravel aquifer was modeled as an area of different flow properties (called an "inhomogeneity") within the bedrock aquifer. The Ohio River was modeled as lines along which ground water enters or leaves the aquifer (called "line sinks").

### **Model Values**

Information needed to run the model includes, at a minimum, **pumping rate** of the well(s), **hydraulic conductivity** of the aquifer (that is, the ease with which water moves through it), **aquifer thickness**, and **aquifer porosity**. For this model, the pumping rate of 3,111,680 gallons per day represents the average daily pumping rate as recorded in Ohio EPA's files, plus an additional 15 percent, to provide a more protective area. Table 1 lists information on values used for the model. The hydraulic conductivity range of 100 to 1100 feet per day for the sand and gravel aquifer was based on a pump tests conducted at the Belmont #3 and Ormet wellfields in 1997 and 1992 respectively. An aquifer thickness of 55 feet was used, based on well logs and information from the investigations at Belmont #3 and Ormet. Site specific information on the hydraulic conductivity of the sandstone and shale bedrock was not available, and measured porosity values were unavailable for any of the units. In these cases, the values used in the model were based on values typically found in these kinds of rock and sediments. They were: 20% porosity for the sand and gravel aquifer, 15% porosity for the sandstone and shale bedrock, and 1 foot per day hydraulic conductivity for the sandstone and shale bedrock.

The protection area was determined based on the best information available at the time of the assessment. If you would like to have more information about how this protection area was derived, or if you would like to collect additional information and revise your protection area, please call Ohio EPA staff listed at the end of this report. Also, a more detailed discussion of the technical aspects of modeling drinking water source protection areas, can be found in the Delineation Guidelines and Process Manual (Ohio EPA, 2000)

on Ohio EPA's Source Water Assessment and Protection Web page ([www.epa.state.oh.us/ddagw/pdu/swap.html](http://www.epa.state.oh.us/ddagw/pdu/swap.html)).

**INVENTORY.** On November 20, 2002, an inventory of potential contaminant sources located within the drinking water source protection area was conducted by Ohio EPA personnel. Twenty potential sources of contamination were identified within the protection area and nineteen potential sources were identified beyond the protection area (see Figure 1). Table 2 provides additional information about these types of potential contaminant sources. Figure 1 shows a portion of the outer protection zone extending into West Virginia. Ohio EPA did not inventory any potential contaminant sources within West Virginia. Martins Ferry is encouraged to contact Mr. Phil Kowalski, Water Plant Manager for the City of Wheeling, West Virginia to complete the potential contaminant source inventory in West Virginia and work with the City of Wheeling to protect Martins Ferry's drinking water source.

A facility or activity is listed as a potential contaminant source if it has the **potential** to release a contaminant, based on the kinds and amounts of chemicals typically associated with that type of facility or activity. It is beyond the scope of this assessment to determine whether any specific potential source is **actually** releasing (or has released) a contaminant to ground water. Also, the inventory is limited to what staff were able to observe on the day of the site visit. Therefore, Martins Ferry Public Water Supply staff should be alert to the possible presence of potential sources of contamination that are not on this list.

**GROUND WATER QUALITY.** A review of the Martins Ferry's water quality record currently available in Ohio EPA's drinking water compliance database did not reveal any evidence of chemical contamination at levels of concern in the aquifer. Please note that this water quality evaluation has some limitations:

- 1) The data evaluated is mostly for treated water samples only, as Ohio EPA's quality requirements are for the water being provided to the public, not the water before treatment.
- 2) Sampling results for coliform bacteria and

naturally-occurring inorganics (other than arsenic) were not evaluated for this assessment, because they are not a reliable indicator of aquifer contamination.

Current information on the quality of the treated water supplied by Martins Ferry Public Water Supply's Public Water System is available in the Consumer Confidence Report for the system, which is distributed annually. It reports on detected contaminants and any associated health risks from data collected during the past five years. Consumer Confidence Reports are available from Martins Ferry Public Water Supply.

**SUSCEPTIBILITY ANALYSIS.** This assessment indicates that Martins Ferry Public Water Supply's source of drinking water has a HIGH susceptibility to contamination due to:

- ▶ the lack of a protective layer of clay or shale overlying the aquifer,
- ▶ a relatively shallow depth (approximately 30 feet below ground surface) of the aquifer,
- ▶ the presence of significant potential contaminant sources in the protection area.

The risk of future contamination can be minimized by implementing appropriate protective measures.

**PROTECTIVE STRATEGIES.** Protective strategies are activities that help protect a drinking water source from becoming contaminated. Implementing these activities benefits the community by helping to:

1. Protect the community's investment in its water supply.
2. Protect the health of the community residents by preventing contamination of its drinking water source.
3. Support the continued economic growth of a community by meeting its water supply needs.
4. Preserve the ground water resource for future generations.
5. Reduce regulatory monitoring costs.

Ohio EPA encourages Martins Ferry Public Water Supply to develop and implement an effective Drinking Water Source Protection Plan. The plan can be developed from the information provided in this Drinking Water Source Assessment Report. The potential contaminant source inventory provides a list of facilities or activities to focus on. Table 3 lists protective strategies that are appropriate for the kinds of facilities/activities listed in the inventory. Finally, a document titled "*Developing Local Drinking Water Source Protection Plans in Ohio*" is enclosed. This document offers comprehensive guidance for developing and implementing a municipal Drinking Water Source Protection Plan. Ongoing implementation of the plan will help protect Martins Ferry Public Water Supply's valuable drinking water resources for current and future generations.

For further technical assistance on drinking water source protection, please contact the Ohio EPA Southeast District Office at (1-800-686-7330) or visit the Ohio EPA Source Water Assessment and Protection Web page at:  
<http://www.epa.state.oh.us/ddagw/pdu/swap.html>.

This report was written by Scott Kester, Ohio EPA, Division of Drinking and Ground Waters, Southeast District Office.

#### **BIBLIOGRAPHY**

Geraghty & Miller, 1992, *Final Remedial Investigation Report, Ormet Corporation*.

Lawhon & Associates, 1997, *Belmont County Sewer and Water District #3 Ranney Collector Well Report of Investigation*.

Ohio EPA public drinking water files.

Ohio Department of Natural Resources, 2002, *Ground Water Pollution Potential of Belmont County, Ohio* (digital DRASTIC map).

Ohio EPA, 2002, *Drinking Water Source Protection Area Delineation Guidelines & Process Manual*, Draft (February, 2002).

Table 1. Data Used in Construction of Ground Water Flow Model

Type of Information	Value Used	Source of information
Pumping rate	3,111,680 gallons per day	Ohio EPA public drinking water files
Aquifer porosity (sand- and gravel)	20%	Estimated, based on conservative porosity of a sand and gravel aquifer
Aquifer thickness	55 feet	Well logs for area, filed at Ohio Department of Natural Resources, Division of Water and the Belmont #3 and Ormet investigations
Hydraulic conductivity of aquifer (sand and gravel)	100 to 1100 feet per day	From pumping test conducted at Belmont #3 and Ormet
Hydraulic conductivity of bedrock (sandstone and shale)	1 foot per day	Best professional judgment, consistent with inhomogeneity model conditions
Precipitation recharge	9 inches per year	Based on GFLOW modeling at other buried valley aquifers in southern Ohio and DRASTIC database

Table 2. Potential Contaminant Sources Located in Martins Ferry Public Water Supply's Drinking Water Source Protection Area

Potential Contaminant Source	Number of Sources	Environmental Concerns	Protection Area
<b>MUNICIPAL SOURCES</b>			
Municipal Garages	1	Among the potential contaminant sources related to these facilities are: underground storage tanks; automotive fluid storage; equipment storage areas; parking lots; vehicle storage areas; vehicle maintenance areas; and vehicle washing areas. These types of facilities may be associated with the potential for leaks and spills of oil, gasoline, other petroleum products, and automotive fluids. Waste oil and machining wastes may contain metals that could contaminate drinking water sources.	Beyond outer protection zone
Other Municipal Sources		Environmental concerns are dependant on the materials used and other site specific conditions.	
<b>COMMERCIAL SOURCES</b>			
Cemeteries	1	Cemeteries have been associated with arsenic and formaldehyde contamination in ground water.	Beyond outer protection zone
Fleet Truck Terminals	1	Among the potential contaminant sources related to these facilities are: underground storage tanks; automotive fluid storage; equipment storage areas; parking lots; vehicle storage areas; vehicle maintenance areas; and vehicle washing areas. These types of facilities may be associated with the potential for leaks and spills of oil, gasoline, other petroleum products, and automotive fluids. Waste oil and machining wastes may contain metals that could contaminate drinking water sources.	Beyond outer protection zone
Railroad Yards	2	Among the potential contaminant sources related to these facilities are: underground storage tanks; automotive fluid storage; equipment storage areas; parking lots; vehicle storage areas; vehicle maintenance areas; and vehicle washing areas. These types of facilities may be associated with the potential for leaks and spills of oil, gasoline, other petroleum products, and automotive fluids. Waste oil and machining wastes may contain metals that could contaminate drinking water sources.	Inner and outer protection zones

Potential Contaminant Source	Number of Sources	Environmental Concerns	Protection Area
Printing Shops	1	Chemicals of concern at photo processing facilities is dependant on the processes used at the facility, but may be a potential source of metals, solvents, and organic chemicals.	Outer protection zone
Other Commercial Sources		Environmental concerns are dependant on the materials used and other site specific conditions.	
<b>INDUSTRIAL SOURCES</b>			
Foundries and Metal Fabricators	1	Among the potential contaminant sources related to these facilities are: waste handling and disposal practices; aboveground storage tanks; underground storage tanks; other liquid storage; bulk material storage; and equipment storage and maintenance areas. These types of facilities may be associated with the potential for leaks and spills of oil and other chemical. Waste streams may contain metals that could contaminate drinking water sources.	Inner and outer protection zone
Historic hazardous materials sites	2	Runoff or leachate from historic hazardous materials sites may be a source of metals, fuels, or organic compounds in source water, dependant on the materials disposed and other site specific conditions.	Outer protection zone and beyond outer protection zone
Other Industrial Sources		Environmental concerns are dependant on the materials used and other site specific conditions.	
<b>WIDESPREAD SOURCES</b>			
Aboveground Storage Tanks	1	Above ground storage tanks present a potential for leaks and spills that could impact surface or ground water.	Inner protection zone
Sewer Lines	>1	If poorly maintained, may be a source of household chemicals, excess nutrients, viruses and bacteria in drinking water sources.	Outer protection zone and beyond outer protection zone
Oil & Gas Wells	20	Potential sources of petroleum and brine, which may leak into an aquifer. Oil, brine, and other fluids may also leak from storage tanks.	Outer protection zone and beyond outer protection zone

Potential Contaminant Source	Number of Sources	Environmental Concerns	Protection Area
Surface Water Bodies	1	May provide a direct pathway for spilled chemicals, nitrates, and pesticides from the ground surface to the aquifer.	Inner and outer protection zones
Highway / Transportation Routes	>1	Accidents on transportation routes pose the threat of leaks and spills of fuels and chemicals. Weed killers used to control vegetation can elevate levels of pesticides in drinking water sources. Runoff may contain oil, metals, and deicers.	Inner and outer protection zones

Table 3. Protective Strategies for Consideration by Martins Ferry Public Water Supply

Potential Contaminant Source	Protective Strategies To Consider
General	<ul style="list-style-type: none"> <li>▶ Purchase additional property or development rights</li> <li>▶ Provide educational material to members of the community on topics regarding the drinking water source protection area.</li> <li>▶ Include drinking water source protection into the local school curriculum.</li> <li>▶ Provide education (material/meetings) to local businesses and industries on topics relating to drinking water source protection.</li> <li>▶ Encourage 'ground water friendly' development.</li> <li>▶ Develop/enact/enforce a local ordinance which may include any of the following: changing zoning; requiring registration of existing facilities; banning certain new types of activities; dictating chemical handling procedures; maintaining/filing a chemical inventory; facility spill/contingency planning; engineering controls for existing/new facilities; paralleling existing federal or state requirements.</li> </ul>



Residential Sources	<ul style="list-style-type: none"> <li>▶ Inventory/remove underground home heating oil tanks in the protection area.</li> <li>▶ Identify areas used for illegal dumping.</li> <li>▶ Provide education (material/meetings) to home owners on: drinking water protection; use/maintenance of septic systems; illegal dumping; proper well abandonment (both the reason and the process).</li> <li>▶ Develop a centralized wastewater collection/treatment system.</li> <li>▶ Encourage/require (and provide incentives) for sealing unused wells.</li> <li>▶ Ensure enforcement of existing requirements for closing unused wells.</li> <li>▶ Ensure the proper construction of new wells.</li> </ul>
Municipal Sources	<ul style="list-style-type: none"> <li>▶ Monitor compliance with existing regulations through inspections and/or contact with regulatory agencies (such as the local fire department, State Fire Marshal, or the Ohio EPA).</li> <li>▶ Encourage/arrange hazardous materials training or waste and disposal assessments for employees.</li> <li>▶ Develop an early release notification system for spills and emergency planning; educate emergency responders to be aware of drinking water protection areas; or coordinate facility spill/contingency planning.</li> <li>▶ Encourage compliance with materials handling procedures/requirements.</li> <li>▶ Install of engineering controls at municipal facilities</li> <li>▶ Implement pollution prevention strategies.</li> <li>▶ Work with the street department and Ohio DOT to minimize use of road salt.</li> <li>▶ Evaluate and close fire cisterns or other city owned wells.</li> <li>▶ Conduct routine sewer inspections, maintenance &amp; upgrades.</li> </ul>
Commercial / Industrial Sources	<ul style="list-style-type: none"> <li>▶ Monitor compliance with existing regulations through inspections and/or contact with regulatory agencies.</li> <li>▶ Use routine inspections as an educational opportunity.</li> <li>▶ Encourage compliance with materials handling procedures/requirements.</li> <li>▶ Encourage/arrange hazardous materials training or waste and disposal assessments for local businesses (and their employees).</li> <li>▶ Request installation of engineering controls for existing facilities.</li> <li>▶ Encourage facility spill/contingency planning in conjunction with the fire department.</li> <li>▶ Encourage local businesses to implement pollution prevention strategies.</li> </ul>
Industrial Sources	<ul style="list-style-type: none"> <li>▶ Monitor compliance with existing regulations through inspections and/or contact with regulatory agencies.</li> <li>▶ Use routine inspections as an educational opportunity.</li> <li>▶ Encourage compliance with materials handling procedures/requirements.</li> <li>▶ Encourage/arrange hazardous materials training or waste and disposal assessments for local industries (and their employees).</li> <li>▶ Encourage facility spill/contingency planning in conjunction with the fire department.</li> <li>▶ Request installation of engineering controls for existing facilities.</li> <li>▶ Encourage local industries to implement pollution prevention strategies.</li> <li>▶ Encourage compliance with materials handling procedures/requirements.</li> <li>▶ Encourage/arrange waste and disposal assessments for local businesses.</li> </ul>

Oil & gas wells	<ul style="list-style-type: none"> <li>▶ Provide education (material/meetings) to owners on maintenance.</li> <li>▶ Ensure/monitor proper operation and maintenance.</li> <li>▶ Develop an early release notification system for spills.</li> </ul>
Spills	<ul style="list-style-type: none"> <li>▶ Develop an early release notification system for spills and an emergency response plan.</li> <li>▶ Include drinking water protection in response planning and training.</li> <li>▶ Post signs indicating the extent of the protection area.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>▶ Create hazardous materials routes around the protection area and require/encourage transporters to use them.</li> <li>▶ Work with local transporters on protection area awareness.</li> <li>▶ Encourage road safety with chemicals.</li> <li>▶ Post signs indicating the extent of the protection area.</li> </ul>

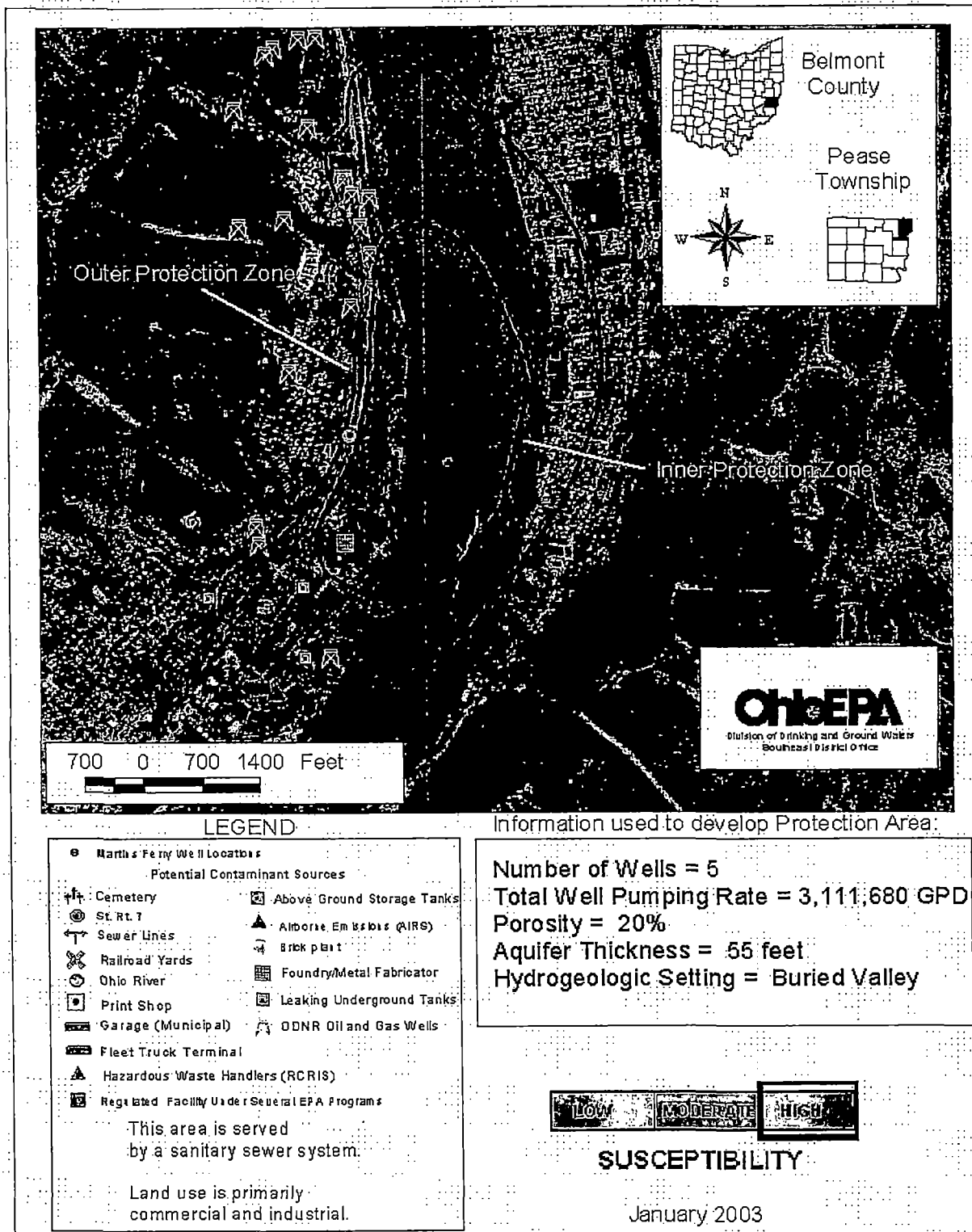
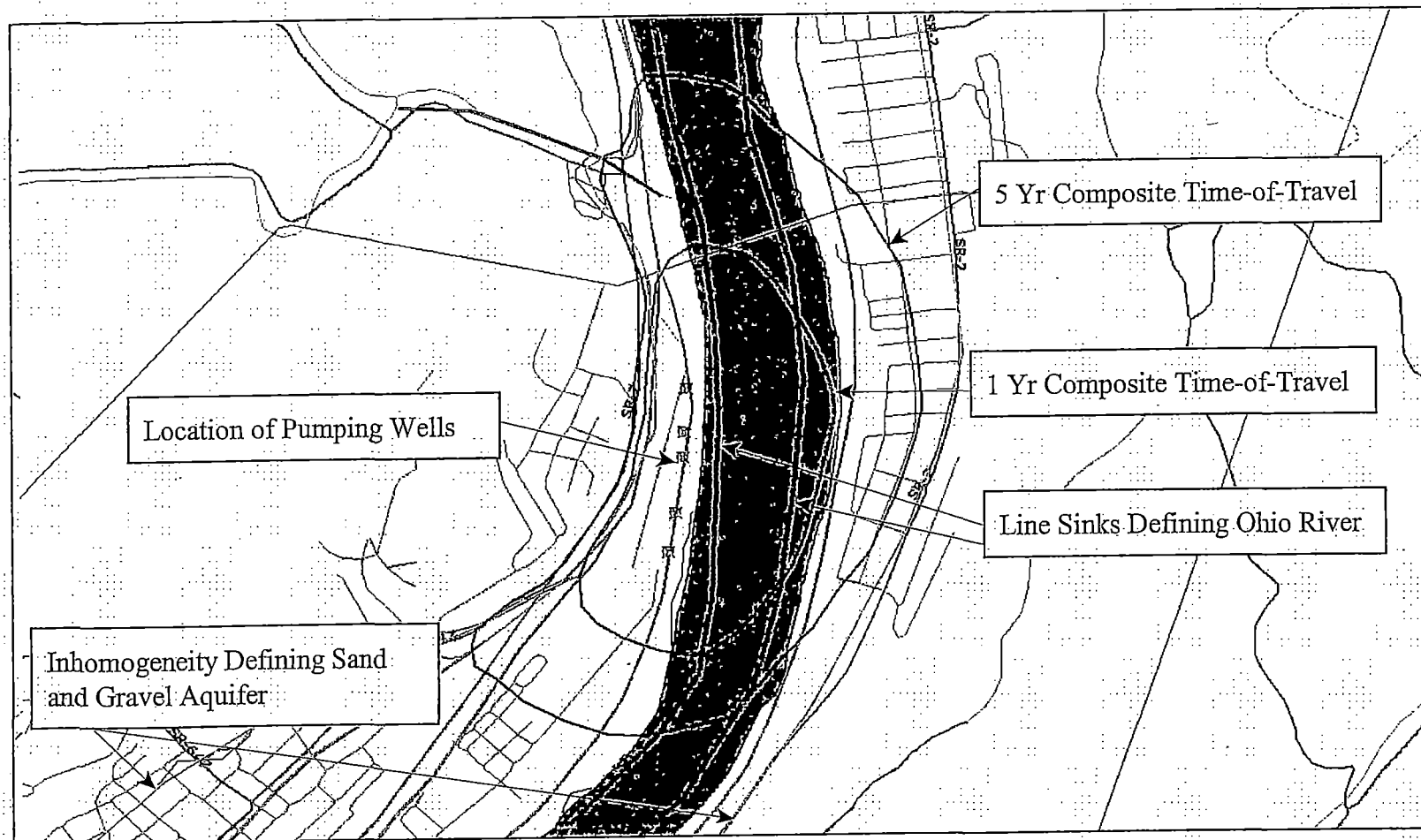


Figure 1. Drinking Water Source Protection Area for Martins Ferry Public Water Supply #0701212.

Figure 2

Model Development Figure for Martins Ferry Public Water Supply



**DRINKING WATER SOURCE  
PROTECTION PLAN**

**FOR**

**The City of Martins Ferry**

**PWS ID# 0701212**

**Date**

**Prepared by:**

## Buy-in by Decision Makers

To effectively develop and implement a protection plan, the public water system's decision makers need to be informed about drinking water source protection and acknowledge the importance of developing a protection plan. The public water system staff should set up a meeting to present and discuss drinking water source protection with these decision makers. The presentation could be given by the public water system staff and/or outside assistants (Ohio EPA staff, Ohio Rural Water Association, consultants, etc.)

### Who should attend?

The system's decision making body (Council, Board of Public Affairs, Board of Directors or Trustees)

### Purpose of Meeting?

To share the information from the drinking water source assessment report, convey the value of a protection plan, and obtain permission to proceed.

### Desired outcome?

The decision makers could pass a resolution that acknowledges the importance of developing a drinking water source protection plan and names a person to oversee the plan development.

### System Decision Makers Meeting

Date of presentation to decision makers \_\_\_\_\_

Was a resolution passed \_\_\_\_ Yes \_\_\_\_ No

Person in charge of oversight of the protection plan development

Name

Title

Phone Number

## Forming a Protection Team

(See Guidance, pages 3-4)

Communities with successful protection plans form a protection team to help develop and implement the plan. A protection team provides a broader level of oversight and should include individuals familiar with protective strategies. Team members may include: water supply staff, local decision makers, teachers, business and industry representatives, concerned citizens, and emergency response personnel.

**All members of the protection team should become familiar with the City of Martins Ferry's Drinking Water Source Assessment Report.** If local emergency responders are not represented on the team, a copy of the plan should be provided to the local fire department.

During the planning process the team can refer to *Developing Local Drinking Water Source Protection Plans in Ohio* to help the city prepare the plan. If needed, Ohio EPA can offer assistance.

List the member(s) of the City of Martins Ferry's Protection Team below:

### DATE PROTECTION TEAM FORMED:

<u>Name</u>	<u>Organization</u>	<u>Title</u>	<u>Phone Number</u>

# Potential Contaminant Source Control Strategies

(see Guidance, pages 5-12)

From the Assessment Report and your own knowledge of the area, list the potential contaminant sources in your protection area. Please rank them (with "1" being the source of greatest concern to you). Your level of concern should be based on distance to wells, amount of chemicals used, toxicity, etc.—see Guidance, pages 5-6 or Section 3.3.6 of the SWAP CD.

Using the table in Appendix A of this template, identify the protective strategies the City of Martins Ferry will use to protect its drinking water from the types of potential contaminant sources identified. Indicate the timeline for implementing this strategy (when initiated, how frequently updated), and the name and/or title of the person responsible for implementing—or tracking the implementation of—the strategy.

<u>Potential Contaminant Source</u>	<u>Priority</u>	<u>Protective Strategies</u>	<u>Timeline for Implementation</u>	<u>Who Will Implement?</u> <u>[Name/Title]</u>

List the education and outreach strategies that you plan to implement throughout your community. Please provide some detail on HOW these will be implemented.

Target Audience: Customers (CU), General Public (GP), Students (ST), Other (write out)

<u>Education and Outreach Strategies</u>	<u>Target Audience</u>	<u>Time line for Implementation</u>	<u>Who (name and/or title) will implement this strategy?</u>




## Contingency Planning – Spill Response

Procedures should be in place for the kinds of catastrophic spills that can reasonably be expected in the wellfield. The chain-of-command, notification procedures and response actions should be known by all water system employees.

DDAGW's contingency planning guidance is available online at <http://www.epa.state.oh.us/ddagw/pwswebpg.htm> . There are links in a couple of places in Section 3.7:

What fire department or hazardous materials response team would respond to a spill in the wellfield?

Martins Ferry Fire Department (Contact information can be found on page \_\_\_ of Martins Ferry's Contingency Plan)

Ohio EPA's Division of Emergency and Remedial Response is capable of providing expertise and assistance related to prevention, containment, and clean-up of chemical spills. Ohio EPA Emergency Response 24-hour Phone # 1-800-282-9378

Ohio EPA District Office Drinking Water Program contact information can be found on page \_\_ of Martins Ferrys Contingency Plan)

Responsibility for coordinating the response procedures will rest upon a key water system staff. This person will oversee and coordinate activities with other water system staff and external organizations.

	Name	Day-Time Phone #	After Hours Phone #
Primary Contact			
Backup Contacts			

Section 3.7 of the SWAP CD, "Preparing for the Unexpected" covers contingency planning and the "What if" process.

## What-if scenarios, and what would you do?

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## Contingency Planning – Source Water Shortage

(including Long-term Drought)

These procedures expand on the procedures established for Source Failure (Pumps, Wells, and/or Intakes). In the event of a source water shortage the City of Martins Ferry will:

1. Contact critical water users and notify them of the situation
2. Contact Ohio EPA
3. Issue use restrictions for the affected area.

Short term alternative sources of water include (mark all that apply):

( ) Water hauled by:

Organization	Phone #	If No Answer #

( ) Activate an existing emergency connection to another public water system or install a new emergency connection to another public water system (with approval of Ohio EPA).

System name:	Contact	Phone #

- ( ) Provide bottled water for potable use from the following organization(s):

Company	Contact	Phone #

- ( ) In consultation with Ohio EPA, develop an alternate source of drinking water.

Is money budgeted for emergency use?

Who can authorize the expenditures?

Under what conditions such can expenditure occur?

## Contingency Planning – Water Supply Planning

(including New Source Development)

Future water supply needs may involve expanding a current wellfield or developing a new one. A community needs to plan for such major expenditures, and may need to acquire options on or secure relatively undeveloped land many years in advance.

The City of Martins Ferry currently supplies \_\_\_\_\_ gallons per day (on average) to \_\_\_\_\_ service connections. Source capacity (wellfield capacity) is \_\_\_\_\_ gallons per day. Current plant capacity is \_\_\_\_\_ gallons per day.

The City of Martins Ferry is providing water at \_\_\_\_\_% of our source capacity and \_\_\_\_\_% of our plant capacity.

The City of Martins Ferry [expects/does not expect] to need to develop additional sources of drinking water because \_\_\_\_\_

Potential options for access to additional sources of drinking water include:

Source Name: Location:
Actions needed to secure access:

## Ground Water Monitoring

(see Guidance for Ground Water Monitoring in WHP/SWP Areas, Ohio EPA, 1999)

The goal of this section is to assess the need for ground water monitoring. Ground water monitoring *is not always necessary*, but it may provide information that leads to effective protective strategies. It may also provide hard evidence of the success (or failure) of those strategies. Success can be translated into continued support, and failure can lead to finding something else that works.

The desirability of ground water monitoring depends on: 1) the susceptibility of the aquifer, 2) the presence of contaminant plumes and point sources, and 3) the protective strategies selected to protect the aquifer.

Discuss this with a ground water professional who knows your system well and/or with your Ohio EPA inspector. Whoever assists you should be familiar with Ohio EPA's 1999 *Guidance*

*for Ground Water Monitoring in Wellhead Protection/Source Water Protection Areas. Pages 1-2 to 1-6 of this document address costs and benefits and how to determine whether you should consider monitoring.*

If the City of Martins Ferry doesn't believe ground water monitoring is needed, list reasons below.

If ground water monitoring is deemed necessary, contact Ohio EPA Drinking Water Source Protection staff to assist you with filling out the Ground Water Monitoring Plan portion of this Protection Plan (provided in the Appendix).

## **Protection Plan Updates**

The City of Martins Ferry commits to reviewing the Drinking Water Source Protection Plan \_\_\_\_\_, beginning with \_\_\_\_\_. Any revisions of the Protection Plan will be documented on the front cover by adding "Revised [date]" beneath the date at the bottom of the page.

The following should be considered:

### **Delineation Updates**

- Has the amount of pumping increased or decreased since the date Ohio EPA provided the Drinking Water Source Assessment report?
- Have any wells been added or removed?
- Has a new wellfield been added or are there any plans for a new wellfield?

If the answer to any of the above questions is yes, please contact Ohio EPA's Source Water Assessment and Protection Program staff at your district office, to determine whether the protection area should be re-delineated. Ohio EPA staff can provide this service without charge, or—if preferred—the community may contract with a private consultant.

### **Potential Contaminant Source Inventory**

- Has the community developed rapidly?
- Have land uses in and around the protection area changed?
- Has management of businesses in the protection area changed?

Ohio EPA recommends re-inventorying the protection area at least every 10 years and encourages updates at shorter intervals, especially where development has been rapid.

Ohio EPA's Source Water Assessment and Protection Program staff can provide assistance, with inventory updates and can also provide an updated map of potential contaminant sources located within and near the protection.

### **Protection Plan**

- Is the list of Protection Team members and contact numbers current?
- Are there new potential contaminant sources that need to be addressed with new potential contaminant source control strategies?
- Should local businesses and residents be reminded about the location of the protection area by redistributing educational materials?
- Are there any updates concerning the size and shape of the protection area that local businesses and residents need to know about?
- Are there any updates to the Drinking Water Shortage/Emergency Response Plan?
- Are there new water quality, potential contaminant source or land use issues that would influence the need to conduct or not to conduct ground water monitoring?



Mixed Sources

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State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Konecny, Director

July 24, 2006

Bud E. Smith, Director  
Environmental Control  
Wheeling Pittsburgh Steel, Co.  
1134 Market Street  
Wheeling, WV 26003

Dear Mr. Smith:

I am sending the raw water data for Martins Ferry. The data for Well 13 was collected by Ohio EPA. Results reported on the Chemical SSR Summary were collected by the system and include sample results for treated water in addition to raw water. Raw water samples are identified as RS under the SMP ID column. Please call me if you have any questions.

Sincerely,

Debra Prim  
Environmental Specialist/Geologist  
OEPA/SEDO/DDAGW

DP/cs

ATTACHMENT 35

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/ Type
701212	752974	DS000	C	4077	4077	402637	2/2/04	Asbestos, >10um	< 0.2		MF/L	V/P
		EP001	C	4074	4074	1002734417	1/17/02	1,1,1,2-Tetrachloroethar	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1,1,2-Tetrachloroethar	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1,1-Trichloroethane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1,1-Trichloroethane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1,2,2-Tetrachloroethar	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1,2,2-Tetrachloroethar	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1,2-Trichloroethane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1,2-Trichloroethane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1-Dichloroethane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1-Dichloroethane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1-Dichloroethene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1-Dichloroethene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,1-Dichloropropene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,1-Dichloropropene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2,3-Trichlorobenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2,3-Trichlorobenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2,3-Trichloropropane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2,3-Trichloropropane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2,4-Trichlorobenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2,4-Trichlorobenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2,4-Trimethylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2,4-Trimethylbenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2-Dichlorobenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2-Dichlorobenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2-Dichloroethane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2-Dichloroethane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,2-Dichloropropane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,2-Dichloropropane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,3,5-Trimethylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,3,5-Trimethylbenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,3-Dichlorobenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,3-Dichlorobenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,3-Dichloropropane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,3-Dichloropropane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,3-Dichloropropene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,3-Dichloropropene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	1,4-Dichlorobenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	1,4-Dichlorobenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	2,2-Dichloropropane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	2,2-Dichloropropane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	2-Chlorotoluene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	2-Chlorotoluene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	4-Chlorotoluene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	4-Chlorotoluene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	4-Isopropyltoluene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	4-Isopropyltoluene	< 0.5		UG/L	V/E
					4054	1002734418	1/17/02	Alachlor	< 0.2		UG/L	M/E
					4054	1002775681	7/24/02	Alachlor	< 0.2		UG/L	M/E
					4100	1005996109	1/31/05	Alachlor	< 0.2		UG/L	V/E
					4095	1002734418	1/17/02	Alpha, total	< 3		PCI/L	M/E
					4074	1002734417	1/17/02	Antimony, total	< 4		UG/L	M/E
					4074	1005996105	1/31/05	Antimony, total	< 4		UG/L	V/E
					4074	1002734417	1/17/02	Arsenic, total	< 5		UG/L	M/E
					4074	1005996105	1/31/05	Arsenic, total	< 3		UG/L	V/E
					4054	1002734418	1/17/02	Atrazine	< 0.3		UG/L	M/E

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/ Type
701212	752974	EP001	C	4074	4054	I102775681	7/24/02	Atrazine	< 0.3		UG/L	M/E
						4100	1/31/05	Atrazine	< 0.3		UG/L	V/E
						4074	1/17/02	Barium, total	< 300		UG/L	M/E
						4074	1/31/05	Barium, total	< 300		UG/L	V/E
						4074	1/17/02	Benzene	< 0.5		UG/L	M/E
						4074	1/31/05	Benzene	< 0.5		UG/L	V/E
						4074	1/17/02	Beryllium, total	< 1		UG/L	M/E
						4074	1/31/05	Beryllium, total	< 1		UG/L	V/E
						4074	1/17/02	Bromobenzene	< 0.5		UG/L	M/E
						4074	1/31/05	Bromobenzene	< 0.5		UG/L	V/E
						4074	1/17/02	Bromochloromethane	< 0.5		UG/L	M/E
						4074	1/31/05	Bromochloromethane	< 0.5		UG/L	V/E
						4074	1/17/02	Bromodichloromethane	< 0.5		UG/L	M/E
						4074	1/31/05	Bromodichloromethane	< 0.5		UG/L	V/E
						4074	1/17/02	Bromoform	+ 2.7		UG/L	M/E
						4074	1/31/05	Bromoform	+ 1.6		UG/L	V/E
						4074	1/17/02	Bromomethane	< 0.5		UG/L	M/E
						4074	1/31/05	Bromomethane	< 0.5		UG/L	V/E
						4074	1/17/02	Cadmium, total	< 1		UG/L	M/E
						4074	1/31/05	Cadmium, total	< 1		UG/L	V/E
						4074	1/17/02	Carbon tetrachloride	< 0.5		UG/L	M/E
						4074	1/31/05	Carbon tetrachloride	< 0.5		UG/L	V/E
						4074	1/17/02	Chlorobenzene	< 0.5		UG/L	M/E
						4074	1/31/05	Chlorobenzene	< 0.5		UG/L	V/E
						4074	1/17/02	Chloroethane	< 0.5		UG/L	M/E
						4074	1/31/05	Chloroethane	< 0.5		UG/L	V/E
						4074	1/17/02	Chloroform	< 0.5		UG/L	M/E
						4074	1/31/05	Chloroform	< 0.5		UG/L	V/E
						4074	1/17/02	Chloromethane	< 0.5		UG/L	M/E
						4074	1/31/05	Chloromethane	< 0.5		UG/L	V/E
						4074	1/17/02	Chromium, total	< 10		UG/L	M/E
						4074	1/31/05	Chromium, total	< 10		UG/L	V/E
						4074	1/17/02	Cyanide, total	< 5		UG/L	M/E
						4074	6/6/05	Cyanide, total	< 5		UG/L	V/E
			O	4074	4054	3002734418	1/17/02	Dibromoacetic acid	< 1		UG/L	M/E
			C	4074	4074	I002734417	1/17/02	Dibromochloromethane	+ 0.9		UG/L	M/E
						4074	1/31/05	Dibromochloromethane	+ 0.9		UG/L	V/E
						4074	1/17/02	Dibromomethane	< 0.5		UG/L	M/E
						4074	1/31/05	Dibromomethane	< 0.5		UG/L	V/E
			O	4074	4054	3002734418	1/17/02	Dichloroacetic acid	< 1		UG/L	M/E
			C	4074	4074	I002734417	1/17/02	Dichlorodifluoromethane	< 0.5		UG/L	M/E
						4074	1/31/05	Dichlorodifluoromethane	< 0.5		UG/L	V/E
						4074	1/17/02	Dichloromethane	< 0.5		UG/L	M/E
						4074	1/31/05	Dichloromethane	< 0.5		UG/L	V/E
						4074	1/17/02	Ethylbenzene	< 0.5		UG/L	M/E
						4074	1/31/05	Ethylbenzene	< 0.5		UG/L	V/E
						4074	1/17/02	Fluoride, total	+ 0.95		MG/L	M/E
						4074	6/6/05	Fluoride, total	+ 1.09		MG/L	V/E
						4074	1/17/02	Hexachlorobutadiene	< 0.5		UG/L	M/E
						4074	1/31/05	Hexachlorobutadiene	< 0.5		UG/L	V/E
						4074	1/17/02	Isopropylbenzene	< 0.5		UG/L	M/E
						4074	1/31/05	Isopropylbenzene	< 0.5		UG/L	V/E
						4074	1/17/02	Mercury, total	< 0.5		UG/L	M/E
						4074	1/31/05	Mercury, total	< 0.5		UG/L	V/E
			O	4074	4054	3002734418	1/17/02	Monobromoacetic acid	< 1		UG/L	M/E
						4054		Monochloroacetic acid	< 1		UG/L	M/E

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/Type
701212	752974	EP001	C	4074	4074	1002734417	1/17/02	Naphthalene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Naphthalene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Nickel, total	< 20		UG/L	M/E
					4074	1005996105	1/31/05	Nickel, total	< 20		UG/L	V/E
					4074	1000588961	2/7/00	Nitrate	+ 0.28		MG/L	M/E
					4074	1001659433	1/30/01	Nitrate	+ 0.28		MG/L	M/E
					4074	1002735848	1/25/02	Nitrate	+ 0.33		MG/L	M/E
					4074	1003817009	1/17/03	Nitrate	+ 0.3		MG/L	M/E
					4074	1004925224	4/6/04	Nitrate	+ 0.33		MG/L	V/E
					4074	1005996105	1/31/05	Nitrate	< 0.5		MG/L	V/E
					4074	1006179035	2/9/06	Nitrate	< 0.5		MG/L	V/E
					4074	1000588961	2/7/00	Nitrate-Nitrite	+ 0.28		MG/L	M/E
					4074	1001659433	1/30/01	Nitrate-Nitrite	+ 0.28		MG/L	M/E
					4074	1002735848	1/25/02	Nitrate-Nitrite	+ 0.33		MG/L	M/E
					4074	1003817009	1/17/03	Nitrate-Nitrite	+ 0.3		MG/L	M/E
					4074	1004925224	4/6/04	Nitrate-Nitrite	+ 0.33		MG/L	V/E
					4074	1005996105	1/31/05	Nitrate-Nitrite	< 0.5		MG/L	V/E
					4074	1006179035	2/9/06	Nitrate-Nitrite	< 0.5		MG/L	V/E
					4074	1000588961	2/7/00	Nitrite	< 0.28		MG/L	M/E
					4074	1001659433	1/30/01	Nitrite	< 0.28		MG/L	M/E
					4074	1002735848	1/25/02	Nitrite	< 0.33		MG/L	M/E
					4074	1003817009	1/17/03	Nitrite	< 0.3		MG/L	M/E
					4074	1004925224	4/6/04	Nitrite	< 0.1		MG/L	V/E
				12345	12345	166701	1/17/03	Radium-228	< 1		PCI/L	M/P
				4074	4074	1002734417	1/17/02	Selemium, total	< 5		UG/L	M/E
					4074	1005996105	1/31/05	Selemium, total	< 5		UG/L	V/E
					4054	1102734418	1/17/02	Simazine	< 0.4		UG/L	M/E
					4054	1102775681	7/24/02	Simazine	< 0.4		UG/L	M/E
					4100	1105996109	1/31/05	Simazine	< 0.4		UG/L	V/E
					4074	1002734417	1/17/02	Styrene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Styrene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Tetrachloroethene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Tetrachloroethene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Thallium, total	< 1.5		UG/L	M/E
					4074	1005996105	1/31/05	Thallium, total	< 1.5		UG/L	V/E
					4074	1002734417	1/17/02	Toluene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Toluene	< 0.5		UG/L	V/E
			O	4074	4054	1002734418	1/17/02	Trichloroacetic acid	< 1		UG/L	M/E
			C	4074	4074	1002734417	1/17/02	Trichloroethene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Trichloroethene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Trichlorofluoromethane	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Trichlorofluoromethane	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Vinyl chloride	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Vinyl chloride	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	Xylenes, total	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	Xylenes, total	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	cis-1,2-Dichloroethene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	cis-1,2-Dichloroethene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	n-Butylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	n-Butylbenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	n-Propylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	n-Propylbenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	sec-Butylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	sec-Butylbenzene	< 0.5		UG/L	V/E
					4074	1002734417	1/17/02	tert-Butylbenzene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	tert-Butylbenzene	< 0.5		UG/L	V/E

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/ Type
701212	752974	EP001	C	4074	4074	1002734417	1/17/02	trans-1,2-Dichloroethene	< 0.5		UG/L	M/E
					4074	1005996105	1/31/05	trans-1,2-Dichloroethene	< 0.5		UG/L	V/E
		MR001	C	4074	4074	3000588966	2/7/00	Bromodichloromethane,	+ 0.6		UG/L	M/E
					4074	3000604296	5/1/00	Bromodichloromethane,	+ 1.3		UG/L	M/E
					4074	3000623104	8/3/00	Bromodichloromethane,	+ 1.7		UG/L	M/E
					4074	3000641831	10/17/00	Bromodichloromethane,	+ 0.9		UG/L	M/E
					4074	3001659833	1/30/01	Bromodichloromethane,	+ 1.4		UG/L	M/E
					4095	3001678438	5/7/01	Bromodichloromethane,	+ 1.3		UG/L	M/E
					4074	3001698772	8/6/01	Bromodichloromethane,	+ 1.6		UG/L	M/E
					4074	3001713091	10/10/01	Bromodichloromethane,	+ 1.3		UG/L	M/E
					4074	3002734426	1/16/02	Bromodichloromethane,	< 0.5		UG/L	M/E
					4074	3002753868	4/18/02	Bromodichloromethane,	+ 1.5		UG/L	M/E
					4074	3002776285	7/24/02	Bromodichloromethane,	+ 2.2		UG/L	M/E
					4074	3002797913	10/17/02	Bromodichloromethane,	+ 1.1		UG/L	M/E
					4074	3003821094	2/4/03	Bromodichloromethane,	+ 1.2		UG/L	M/E
					4074	3003840229	4/24/03	Bromodichloromethane,	+ 2		UG/L	M/E
					4074	3003871671	8/19/03	Bromodichloromethane,	+ 1.9		UG/L	M/E
					4074	3003897203	11/19/03	Bromodichloromethane,	+ 1.7		UG/L	M/E
					4074	3000588966	2/7/00	Bromoform, THMs	+ 17.9		UG/L	M/E
					4074	3000604296	5/1/00	Bromoform, THMs	+ 11.2		UG/L	M/E
					4074	3000623104	8/3/00	Bromoform, THMs	+ 7.6		UG/L	M/E
					4074	3000641831	10/17/00	Bromoform, THMs	+ 12.2		UG/L	M/E
					4074	3001659833	1/30/01	Bromoform, THMs	+ 18.3		UG/L	M/E
					4095	3001678438	5/7/01	Bromoform, THMs	+ 11		UG/L	M/E
					4074	3001698772	8/6/01	Bromoform, THMs	+ 16.1		UG/L	M/E
					4074	3001713091	10/10/01	Bromoform, THMs	+ 24.9		UG/L	M/E
					4074	3002734426	1/16/02	Bromoform, THMs	+ 6.7		UG/L	M/E
					4074	3002753868	4/18/02	Bromoform, THMs	+ 22.6		UG/L	M/E
					4074	3002776285	7/24/02	Bromoform, THMs	+ 9		UG/L	M/E
					4074	3002797913	10/17/02	Bromoform, THMs	+ 14.2		UG/L	M/E
					4074	3003821094	2/4/03	Bromoform, THMs	+ 8.3		UG/L	M/E
					4074	3003840229	4/24/03	Bromoform, THMs	+ 16.4		UG/L	M/E
					4074	3003871671	8/19/03	Bromoform, THMs	+ 8.8		UG/L	M/E
					4074	3003897203	11/19/03	Bromoform, THMs	+ 8.3		UG/L	M/E
					4074	3000588966	2/7/00	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3000604296	5/1/00	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3000623104	8/3/00	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3000641831	10/17/00	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3001659833	1/30/01	Chloroform, THMs	< 0.5		UG/L	M/E
					4095	3001678438	5/7/01	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3001698772	8/6/01	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3001713091	10/10/01	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3002734426	1/16/02	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3002753868	4/18/02	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3002776285	7/24/02	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3002797913	10/17/02	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3003821094	2/4/03	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3003840229	4/24/03	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3003871671	8/19/03	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3003897203	11/19/03	Chloroform, THMs	< 0.5		UG/L	M/E
					4074	3000588966	2/7/00	Dibromochloromethane,	+ 5.1		UG/L	M/E
					4074	3000604296	5/1/00	Dibromochloromethane,	+ 5.9		UG/L	M/E
					4074	3000623104	8/3/00	Dibromochloromethane,	+ 5.8		UG/L	M/E
					4074	3000641831	10/17/00	Dibromochloromethane,	+ 4.6		UG/L	M/E
					4074	3001659833	1/30/01	Dibromochloromethane,	+ 7.6		UG/L	M/E
					4095	3001678438	5/7/01	Dibromochloromethane,	+ 5.7		UG/L	M/E

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/Type
701212	752974	MR001	C	4074	4074	3001698772	8/6/01	Dibromochloromethane,	+ 7.4		UG/L	M/E
					4074	3001713091	10/10/01	Dibromochloromethane,	+ 7.8		UG/L	M/E
					4074	3002734426	1/16/02	Dibromochloromethane,	+ 1.8		UG/L	M/E
					4074	3002753868	4/18/02	Dibromochloromethane,	+ 9.3		UG/L	M/E
					4074	3002776285	7/24/02	Dibromochloromethane,	+ 7.2		UG/L	M/E
					4074	3002797913	10/17/02	Dibromochloromethane,	+ 6.2		UG/L	M/E
					4074	3003821094	2/4/03	Dibromochloromethane,	+ 5.5		UG/L	M/E
					4074	3003840229	4/24/03	Dibromochloromethane,	+ 8.8		UG/L	M/E
					4074	3003871671	8/19/03	Dibromochloromethane,	+ 6.5		UG/L	M/E
					4074	3003897203	11/19/03	Dibromochloromethane,	+ 6.1		UG/L	M/E
					4074	3000588966	2/7/00	Trihalomethanes, total	+ 23.6		UG/L	M/E
					4074	3000604296	5/1/00	Trihalomethanes, total	+ 18.4		UG/L	M/E
					4074	3000623104	8/3/00	Trihalomethanes, total	+ 15.1		UG/L	M/E
					4074	3000641831	10/17/00	Trihalomethanes, total	+ 17.7		UG/L	M/E
					4074	3001659833	1/30/01	Trihalomethanes, total	+ 27.3		UG/L	M/E
					4095	3001678438	5/7/01	Trihalomethanes, total	+ 18		UG/L	M/E
					4074	3001698772	8/6/01	Trihalomethanes, total	+ 25.1		UG/L	M/E
					4074	3001713091	10/10/01	Trihalomethanes, total	+ 34		UG/L	M/E
					4074	3002734426	1/16/02	Trihalomethanes, total	+ 8.5		UG/L	M/E
					4074	3002753868	4/18/02	Trihalomethanes, total	+ 33.4		UG/L	M/E
					4074	3002776285	7/24/02	Trihalomethanes, total	+ 18.4		UG/L	M/E
					4074	3002797913	10/17/02	Trihalomethanes, total	+ 21.5		UG/L	M/E
					4074	3003821094	2/4/03	Trihalomethanes, total	+ 15		UG/L	M/E
					4074	3003840229	4/24/03	Trihalomethanes, total	+ 27.2		UG/L	M/E
					4074	3003871671	8/19/03	Trihalomethanes, total	+ 17.2		UG/L	M/E
					4074	3003897203	11/19/03	Trihalomethanes, total	+ 16.1		UG/L	M/E
		MR002	C	4074	4074	3004948553	7/7/04	Bromodichloromethane,	+ 2.6		UG/L	V/E
					4074	3006137387	8/3/05	Bromodichloromethane,	+ 3.7		UG/L	V/E
					4074	3004948553	7/7/04	Bromoform, THMs	+ 6		UG/L	V/E
					4074	3006137387	8/3/05	Bromoform, THMs	+ 14.4		UG/L	V/E
					4074	3004948553	7/7/04	Chloroform, THMs	+ 0.6		UG/L	V/E
					4074	3006137387	8/3/05	Chloroform, THMs	+ 0.6		UG/L	V/E
				4054	4054	336710	7/21/04	Dibromoacetic acid	+ 1.4		UG/L	V/E
				4074	4074	3005138809	8/10/05	Dibromoacetic acid	+ 3.58		UG/L	V/E
					4074	3004948553	7/7/04	Dibromochloromethane,	+ 6.2		UG/L	V/E
					4074	3006137387	8/3/05	Dibromochloromethane,	+ 12.9		UG/L	V/E
				4054	4054	336710	7/21/04	Dichloroacetic acid	< 1		UG/L	V/E
				4074	4074	3005138809	8/10/05	Dichloroacetic acid	< 1		UG/L	V/E
				4054	4054	336710	7/21/04	Haloacetic Acids, five (H	+ 1.4		UG/L	V/E
				4074	4074	3005138809	8/10/05	Haloacetic Acids, five (H	+ 3.58		UG/L	V/E
				4054	4054	336710	7/21/04	Monobromoacetic acid	< 1		UG/L	V/E
				4074	4074	3005138809	8/10/05	Monobromoacetic acid	< 1		UG/L	V/E
				4054	4054	336710	7/21/04	Monochloroacetic acid	< 1		UG/L	V/E
				4074	4074	3005138809	8/10/05	Monochloroacetic acid	< 2		UG/L	V/E
				4054	4054	336710	7/21/04	Trichloroacetic acid	< 1		UG/L	V/E
				4074	4074	3005138809	8/10/05	Trichloroacetic acid	< 1		UG/L	V/E
					4074	3004948553	7/7/04	Trihalomethanes, total	+ 15.4		UG/L	V/E
					4074	3006137387	8/3/05	Trihalomethanes, total	+ 31.6		UG/L	V/E
		RS002	N	4054	4054	1115758	12/19/01	1,1,1,2-Tetrachloroethar	< 0.5		UG/L	M/P
					4054			1,1,1-Trichloroethane	< 0.5		UG/L	M/P
					4054			1,1,2,2-Tetrachloroethar	< 0.5		UG/L	M/P
					4054			1,1,2-Trichloroethane	< 0.5		UG/L	M/P
					4054			1,1-Dichloroethane	< 0.5		UG/L	M/P
					4054			1,1-Dichloroethene	< 0.5		UG/L	M/P
					4054			1,1-Dichloropropene	< 0.5		UG/L	M/P
					4054			1,2,3-Trichlorobenzene	< 0.5		UG/L	M/P

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/Type
701212	752974	RS002	N	4054	4054	1115758	12/19/01	1,2,3-Trichloropropane	< 0.5		UG/L	M/P
					4054			1,2,4-Trichlorobenzene	< 0.5		UG/L	M/P
					4054			1,2,4-Trimethylbenzene	< 0.5		UG/L	M/P
					4054			1,2-Dichlorobenzene	< 0.5		UG/L	M/P
					4054			1,2-Dichloroethane	< 0.5		UG/L	M/P
					4054			1,2-Dichloropropane	< 0.5		UG/L	M/P
					4054			1,3,5-Trimethylbenzene	< 0.5		UG/L	M/P
					4054			1,3-Dichlorobenzene	< 0.5		UG/L	M/P
					4054			1,3-Dichloropropane	< 0.5		UG/L	M/P
					4054			1,3-Dichloropropene	< 0.5		UG/L	M/P
					4054			1,4-Dichlorobenzene	< 0.5		UG/L	M/P
					4054			2,2-Dichloropropane	< 0.5		UG/L	M/P
					4054			2-Chlorotoluene	< 0.5		UG/L	M/P
					4054			4-Chlorotoluene	< 0.5		UG/L	M/P
					4054			4-Isopropyltoluene	< 0.5		UG/L	M/P
					4054	2215758	12/19/01	Alachlor	< 0.2		UG/L	M/P
				4053	4053	128709	12/19/01	Alkalinity, total	+ 100		MG/L	M/P
					4095	128708	12/19/01	Alpha, total	< 3		PCI/L	M/P
					4053	128709	12/19/01	Antimony, total	< 3		UG/L	M/P
					4053			Arsenic, total	< 3		UG/L	M/P
				4054	4054	2215758	12/19/01	Atrazine	< 0.3		UG/L	M/P
				4053	4053	128709	12/19/01	Barium, total	+ 71		UG/L	M/P
				4054	4054	1115758	12/19/01	Benzene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Beryllium, total	< 0.5		UG/L	M/P
					4095	128708	12/19/01	Beta, total	< 4		PCI/L	M/P
				4054	4054	1115758	12/19/01	Bromobenzene	< 0.5		UG/L	M/P
					4054			Bromochloromethane	< 0.5		UG/L	M/P
					4054			Bromodichloromethane	< 0.5		UG/L	M/P
					4054			Bromoform	< 0.5		UG/L	M/P
					4054			Bromomethane	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Cadmium, total	< 0.5		UG/L	M/P
					4053			Calcium, total	+ 54		MG/L	M/P
				4054	4054	1115758	12/19/01	Carbon tetrachloride	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Chloride, total	+ 35		MG/L	M/P
				4054	4054	1115758	12/19/01	Chlorobenzene	< 0.5		UG/L	M/P
					4054			Chloroethane	< 0.5		UG/L	M/P
					4054			Chloroform	< 0.5		UG/L	M/P
					4054			Chloromethane	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Chromium, total	< 10		UG/L	M/P
					4053			Copper, total	< 10		UG/L	M/P
					4053			Cyanide, total	< 5		UG/L	M/P
				4054	4054	1115758	12/19/01	Dibromochloromethane	< 0.5		UG/L	M/P
					4054			Dibromomethane	< 0.5		UG/L	M/P
					4054			Dichlorodifluoromethane	< 0.5		UG/L	M/P
					4054			Dichloromethane	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Dissolved Solids, total	+ 281		MG/L	M/P
				4054	4054	1115758	12/19/01	Ethylbenzene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Fluoride, total	+ 0.29		MG/L	M/P
				4054	4054	1115758	12/19/01	Hexachlorobutadiene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Iron, total	+ 143		UG/L	M/P
				4054	4054	1115758	12/19/01	Isopropylbenzene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Lead, total	< 2		UG/L	M/P
					4053			Magnesium, total	+ 11		MG/L	M/P
					4053			Manganese, total	+ 884		UG/L	M/P
					4053			Mercury, total	< 0.2		UG/L	M/P
				4054	4054	2215758	12/19/01	Metolachlor	< 5		UG/L	M/P

# Chemical SSR Summary (All Samples)

Pws Id	Stu Id	SMP ID	Sample Type	Report Lab ID	Analysis Lab ID	Sample Number	Sample Date	Substance Name	Sign	Result	Units	Status/ Type
701212	752974	RS002	N	4054	4054	2215758	12/19/01	Metribuzin	< 2		UG/L	M/P
					4054	1115758	12/19/01	Naphthalene	< 0.5		UG/L	M/P
					4053	4053	128709	12/19/01	Nickel, total	< 10	UG/L	M/P
					4053			Nitrate	< 0.1		MG/L	M/P
					4053			Nitrate-Nitrite	< 0.1		MG/L	M/P
					4053			Nitrite	< 0.05		MG/L	M/P
					4053			Selenium, total	< 3		UG/L	M/P
					4053			Silver, total	< 10		UG/L	M/P
				4054	4054	2215758	12/19/01	Simazine	< 0.4		UG/L	M/P
				4053	4053	128709	12/19/01	Sodium, total	+ 27		MG/L	M/P
				4054	4054	1115758	12/19/01	Styrene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Sulfate, total	+ 85		MG/L	M/P
				4054	4054	1115758	12/19/01	Tetrachloroethene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	Thallium, total	< 1		UG/L	M/P
				4054	4054	1115758	12/19/01	Toluene	< 0.5		UG/L	M/P
					4054			Trichloroethene	< 0.5		UG/L	M/P
					4054			Trichlorofluoromethane	< 0.5		UG/L	M/P
					4054			Vinyl chloride	< 0.5		UG/L	M/P
					4054			Xylenes, total	< 0.5		UG/L	M/P
					4054			cis-1,2-Dichloroethene	< 0.5		UG/L	M/P
					4054			n-Butylbenzene	< 0.5		UG/L	M/P
					4054			n-Propylbenzene	< 0.5		UG/L	M/P
				4053	4053	128709	12/19/01	pH, lab	+ 7.22		SU	M/P
				4054	4054	1115758	12/19/01	sec-Butylbenzene	< 0.5		UG/L	M/P
					4054			tert-Butylbenzene	< 0.5		UG/L	M/P
					4054			trans-1,2-Dichloroethene	< 0.5		UG/L	M/P



**OhioEPA** Division of Environmental Services  
**Laboratory Inorganic Analysis Data Report**

O.E.P.A.  
S.E.D.O.

<b>Sample</b> 81922		<b>Collected by</b> JACOBS, JANE	
<b>Date Received</b> 04/26/2006 10:51 AM	<b>Matrix</b> GW	<b>Sample Type</b> AMBIENT	2006 MAY 30 AM 10:47
<b>Begin</b>	<b>End</b>	<b>Station ID</b> 39BEL8881	
<b>Date Collected</b>	04/25/2006 1:00 PM	<b>Customer ID</b> 13	
<b>Program</b> SEDO-DDAGW		<b>External ID</b>	
<b>Client</b> GROUND_WATER			
<b>Location</b> MARTINS FERRY WELL 13			

Analysis	Parameter	Storet	Result	RL	Units	Date	Qualifier
<i>Solids_Diss</i>	Total Dissolved Solids	P70300	256	10	mg/L	04/29/2006	
<i>TOC</i>	TOC	P680	<2.0	2	mg/L	05/04/2006	
<i>ICP_(WAT)</i>	Aluminum	P1105	<200	200	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Barium	P1007	57	15	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Calcium	P916	53	2	mg/L	05/01/2006	
<i>ICP_(WAT)</i>	Chromium	P1034	<30	30	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Copper	P1042	<10	10	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Hardness, Total	P900	174	10	mg/L	05/01/2006	
<i>ICP_(WAT)</i>	Iron	P1045	86	50	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Magnesium	P927	10	1	mg/L	05/01/2006	
<i>ICP_(WAT)</i>	Manganese	P1055	713	10	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Nickel	P1067	<40	40	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Potassium	P937	2	2	mg/L	05/01/2006	
<i>ICP_(WAT)</i>	Sodium	P929	25	5	mg/L	05/01/2006	
<i>ICP_(WAT)</i>	Strontium	P1082	220	30	ug/L	05/01/2006	
<i>ICP_(WAT)</i>	Zinc	P1092	<10	10	ug/L	05/01/2006	
<i>SIMAA_(WAT)</i>	Arsenic	P1002	<2.0	2	ug/L	04/28/2006	
<i>SIMAA_(WAT)</i>	Cadmium	P1027	<0.20	0.2	ug/L	04/28/2006	
<i>SIMAA_(WAT)</i>	Lead	P1051	<2.0	2	ug/L	04/28/2006	
<i>SIMAA_(WAT)</i>	Selenium	P1147	<2.0	2	ug/L	04/28/2006	
<i>Alkalinity</i>	Alkalinity	P410	85.8	5	mg/L	04/28/2006	
<i>Ammonia</i>	Ammonia	P610	<0.050	0.05	mg/L	05/01/2006	
<i>COD</i>	COD	P340	<10	10	mg/L	05/22/2006	
<i>Chloride</i>	Chloride	P940	37.6	5	mg/L	05/08/2006	
<i>Fluoride</i>	Fluoride	P951	0.27	0.2	mg/L	05/11/2006	
<i>Nitrate</i>	Nitrate+nitrite	P630	0.18	0.1	mg/L	05/01/2006	
<i>Sulfate</i>	Sulfate	P945	67.5	10	mg/L	05/09/2006	
<i>TKN</i>	TKN	P625	0.37	0.2	mg/L	05/09/2006	
<i>TP</i>	Total Phosphorus	P665	<0.010	0.01	mg/L	05/09/2006	

**Field Comments**

**Lab Comments**

**QC / Sample Comments**

**Approved By**

SR

On

5-24-06

Definition Of Qualifiers is attached when required

# OhioEPA Division of Environmental Services

## Laboratory Inorganic Analysis Data Report

<b>Sample</b> 79780		
<b>Date Received</b> 10/19/2005 12:01 PM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JON
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/18/2005 1:30 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		<b>External ID</b>
<b>Location</b> MTS FERRY WELL 13		

Analysis	Parameter	Storet	Result	RL	Units	Date	Qualifier
Solids_Diss	Total Dissolved Solids	P70300	434	10	mg/L	10/23/2005	
TOC	TOC	P680	<2.0	2	mg/L	10/28/2005	
ICP_(WAT)	Aluminum	P1105	<200	200	ug/L	10/31/2005	
ICP_(WAT)	Barium	P1007	94	15	ug/L	10/31/2005	
ICP_(WAT)	Calcium	P916	90	2	mg/L	10/31/2005	
ICP_(WAT)	Chromium	P1034	<30	30	ug/L	10/31/2005	
ICP_(WAT)	Copper	P1042	<10	10	ug/L	10/31/2005	
ICP_(WAT)	Hardness, Total	P900	282	10	mg/L	10/31/2005	
ICP_(WAT)	Iron	P1045	336	50	ug/L	10/31/2005	
ICP_(WAT)	Magnesium	P927	14	1	mg/L	10/31/2005	
ICP_(WAT)	Manganese	P1055	1120	10	ug/L	10/31/2005	
ICP_(WAT)	Nickel	P1067	<40	40	ug/L	10/31/2005	
ICP_(WAT)	Potassium	P937	3	2	mg/L	10/31/2005	
ICP_(WAT)	Sodium	P929	33	5	mg/L	10/31/2005	
ICP_(WAT)	Strontium	P1082	319	30	ug/L	10/31/2005	
ICP_(WAT)	Zinc	P1092	<10	10	ug/L	10/31/2005	
SIMAA_(WAT)	Arsenic	P1002	<2.0	2	ug/L	10/26/2005	
SIMAA_(WAT)	Cadmium	P1027	<0.20	0.2	ug/L	10/26/2005	
SIMAA_(WAT)	Lead	P1051	<2.0	2	ug/L	10/26/2005	
SIMAA_(WAT)	Selenium	P1147	<2.0	2	ug/L	10/26/2005	
Alkalinity	Alkalinity	P410	114	5	mg/L	10/28/2005	
Ammonia	Ammonia	P610	<0.050	0.05	mg/L	10/27/2005	
COD	COD	P340	<10	10	mg/L	10/24/2005	
Chloride	Chloride	P940	62.7	5	mg/L	10/31/2005	
Fluoride	Fluoride	P951	0.27	0.2	mg/L	10/24/2005	
Nitrate	Nitrate+nitrite	P630	<0.10	0.1	mg/L	10/27/2005	
Sulfate	Sulfate	P945	137	50	mg/L	10/31/2005	
TKN	TKN	P625	<0.20	0.2	mg/L	10/25/2005	
TP	Total Phosphorus	P665	<0.010	0.01	mg/L	10/25/2005	

### Field Comments

### Lab Comments

### QC / Sample Comments

Approved By

SR

On

11-4-05

Definition Of Qualifiers is attached when required

**Laboratory Organic Analysis Data Report**

<b>Sample</b> 79782	<b>EPA Method</b> USEPA 524.2	<b>Units</b> ug/L
<b>Date Received</b> 10/19/2005 12:01 PM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JON
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/18/2005 1:30 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		<b>External ID</b>
<b>Location</b> MTS FERRY WELL 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Benzene	000071-43-2	<0.50	0.5	10/25/2005	
Bromobenzene	000108-86-1	<0.50	0.5	10/25/2005	
Bromochloromethane	000074-97-5	<0.50	0.5	10/25/2005	
Bromodichloromethane	000075-27-4	<0.50	0.5	10/25/2005	
Bromoform	000075-25-2	<0.50	0.5	10/25/2005	
Bromomethane	000074-83-9	<0.50	0.5	10/25/2005	
n-Butylbenzene	000104-51-8	<0.50	0.5	10/25/2005	
sec-Butylbenzene	000135-98-8	<0.50	0.5	10/25/2005	
tert-Butylbenzene	000098-06-6	<0.50	0.5	10/25/2005	
Carbon tetrachloride	000056-23-5	<0.50	0.5	10/25/2005	
Chlorobenzene	000108-90-7	<0.50	0.5	10/25/2005	
Chloroethane	000075-00-3	<0.50	0.5	10/25/2005	
Chloroform	000067-66-3	<0.50	0.5	10/25/2005	
Chloromethane	000074-87-3	<0.50	0.5	10/25/2005	
2-Chlorotoluene	000095-49-8	<0.50	0.5	10/25/2005	
4-Chlorotoluene	000106-43-4	<0.50	0.5	10/25/2005	
Dibromochloromethane	000124-48-1	<0.50	0.5	10/25/2005	
1,2-Dibromo-3-chloropropane	000096-12-8	<0.50	0.5	10/25/2005	
1,2-Dibromoethane	000106-93-4	<0.50	0.5	10/25/2005	
Dibromomethane	000074-95-3	<0.50	0.5	10/25/2005	
1,2-Dichlorobenzene	000095-50-1	<0.50	0.5	10/25/2005	
1,3-Dichlorobenzene	000541-73-1	<0.50	0.5	10/25/2005	
1,4-Dichlorobenzene	000106-46-7	<0.50	0.5	10/25/2005	
Dichlorodifluoromethane	000075-71-8	<0.50	0.5	10/25/2005	
1,1-Dichloroethane	000075-34-3	<0.50	0.5	10/25/2005	
1,2-Dichloroethane	000107-06-2	<0.50	0.5	10/25/2005	
1,1-Dichloroethene	000075-35-4	<0.50	0.5	10/25/2005	
cis-1,2-Dichloroethene	000156-59-2	<0.50	0.5	10/25/2005	
trans-1,2-Dichloroethene	000156-60-5	<0.50	0.5	10/25/2005	
1,2-Dichloropropane	000078-87-5	<0.50	0.5	10/25/2005	
1,3-Dichloropropane	000142-28-9	<0.50	0.5	10/25/2005	
2,2-Dichloropropane	000594-20-7	<0.50	0.5	10/25/2005	
1,1-Dichloropropene	000563-58-6	<0.50	0.5	10/25/2005	
cis-1,3-Dichloropropene	010061-01-5	<0.50	0.5	10/25/2005	
trans-1,3-Dichloropropene	010061-02-6	<0.50	0.5	10/25/2005	
Ethylbenzene	000100-41-4	<0.50	0.5	10/25/2005	
Hexachlorobutadiene	000087-68-3	<0.50	0.5	10/25/2005	
Isopropylbenzene	000098-82-8	<0.50	0.5	10/25/2005	
4-Isopropyltoluene	000099-87-6	<0.50	0.5	10/25/2005	
Methylene chloride	000075-09-2	<0.50	0.5	10/25/2005	
Methyl-tert-butyl ether	001634-04-4	<0.50	0.5	10/25/2005	
Naphthalene	000091-20-3	<0.50	0.5	10/25/2005	
n-Propylbenzene	000103-65-1	<0.50	0.5	10/25/2005	
Styrene	000100-42-5	<0.50	0.5	10/25/2005	
1,1,1,2-Tetrachloroethane	000630-20-6	<0.50	0.5	10/25/2005	
1,1,2,2-Tetrachloroethane	000079-34-5	<0.50	0.5	10/25/2005	
Tetrachloroethene	000127-18-4	<0.50	0.5	10/25/2005	
Toluene	000108-88-3	<0.50	0.5	10/25/2005	
1,2,3-Trichlorobenzene	000087-61-6	<0.50	0.5	10/25/2005	
1,2,4-Trichlorobenzene	000120-82-1	<0.50	0.5	10/25/2005	
1,1,1-Trichloroethane	000071-55-6	<0.50	0.5	10/25/2005	
1,1,2-Trichloroethane	000079-00-5	<0.50	0.5	10/25/2005	
Trichloroethene	000079-01-6	<0.50	0.5	10/25/2005	
Trichlorofluoromethane	000075-69-4	<0.50	0.5	10/25/2005	
1,2,3-Trichloropropane	000096-18-4	<0.50	0.5	10/25/2005	
1,2,4-Trimethylbenzene	000095-63-6	<0.50	0.5	10/25/2005	
1,3,5-Trimethylbenzene	000108-67-8	<0.50	0.5	10/25/2005	

**OhioEPA** Division of Environmental Services**Laboratory Organic Analysis Data Report**

<b>Sample</b> 79782	<b>EPA Method</b> USEPA 524.2	<b>Units</b> ug/L
<b>Date Received</b> 10/19/2005 12:01 PM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JON
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/18/2005 1:30 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		<b>External ID</b>
<b>Location</b> MTS FERRY WELL 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Vinyl chloride	000075-01-4	<0.50	0.5	10/25/2005	
o-Xylene	000095-47-6	<0.50	0.5	10/25/2005	
Total m&p-xylenes	000108-38-3	<0.50	0.5	10/25/2005	
Trihalomethanes (THMs)	Unknown	<0.50	0.5	10/25/2005	

**Field Comments****Lab Comments****QC / Sample  
Comments****Approved By**

DT

On

11-2-05

*Definition Of Qualifiers is attached when required*

# OhioEPA Division of Environmental Services

## Laboratory Inorganic Analysis Data Report

<b>Sample</b> 72498	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JANE
<b>Date Received</b> 04/07/2005 9:24 AM	<b>End</b> 05 MAY 13 PM 2:23	<b>Sample Type</b> AMBIENT
<b>Begin</b>	<b>04/06/2005 1:00 PM</b>	<b>Station ID</b> 39BEL08881
<b>Date Collected</b>		<b>Customer ID</b> 13
<b>Program</b> SEDO-DDAGW		<b>External ID</b>
<b>Client</b> GROUND_WATER		
<b>Location</b> Mts. Ferry well 13		

Analysis	Parameter	Storet	Result	RL	Units	Date	Qualifier
Solids_Diss	Total Dissolved Solids	P70300	246	10	mg/L	04/08/2005	
TOC	TOC	P680	<2.0	2	mg/L	04/14/2005	
ICP_(WAT)	Aluminum	P1105	<200	200	ug/L	04/11/2005	
ICP_(WAT)	Barium	P1007	52	15	ug/L	04/11/2005	
ICP_(WAT)	Calcium	P916	47	2	mg/L	04/11/2005	
ICP_(WAT)	Chromium	P1034	<30	30	ug/L	04/11/2005	
ICP_(WAT)	Copper	P1042	<10	10	ug/L	04/11/2005	
ICP_(WAT)	Hardness, Total	P900	154	10	mg/L	04/11/2005	
ICP_(WAT)	Iron	P1045	211	50	ug/L	04/11/2005	
ICP_(WAT)	Magnesium	P927	9	1	mg/L	04/11/2005	
ICP_(WAT)	Manganese	P1055	694	10	ug/L	04/11/2005	
ICP_(WAT)	Nickel	P1067	<40	40	ug/L	04/11/2005	
ICP_(WAT)	Potassium	P937	2	2	mg/L	04/11/2005	
ICP_(WAT)	Sodium	P929	17	5	mg/L	04/11/2005	
ICP_(WAT)	Strontium	P1082	189	30	ug/L	04/11/2005	
ICP_(WAT)	Zinc	P1092	<10	10	ug/L	04/11/2005	
SIMAA_(WAT)	Arsenic	P1002	<2.0	2	ug/L	04/13/2005	
SIMAA_(WAT)	Cadmium	P1027	<0.20	0.2	ug/L	04/13/2005	
SIMAA_(WAT)	Lead	P1051	<2.0	2	ug/L	04/13/2005	
SIMAA_(WAT)	Selenium	P1147	<2.0	2	ug/L	04/13/2005	
Alkalinity	Alkalinity	P410	92.4	5	mg/L	04/13/2005	
Ammonia	Ammonia	P610	0.053	0.05	mg/L	04/14/2005	
COD	COD	P340	<10	10	mg/L	04/29/2005	
Chloride	Chloride	P940	26.1	5	mg/L	04/21/2005	
Fluoride	Fluoride	P951	0.26	0.2	mg/L	04/11/2005	
Nitrate	Nitrate+nitrite	P630	<0.10	0.1	mg/L	04/14/2005	
Sulfate	Sulfate	P945	64.7	20	mg/L	04/21/2005	
TKN	TKN	P625	<0.20	0.2	mg/L	04/13/2005	
TP	Total Phosphorus	P665	<0.010	0.01	mg/L	04/13/2005	

<b>Field Comments</b>	
<b>Lab Comments</b>	
<b>QC / Sample Comments</b>	

Approved By DT On 5-6-05

Definition Of Qualifiers is attached when required

# Laboratory Organic Analysis Data Report

<b>Sample</b> 62879	<b>EPA Method</b> USEPA 524.2	
<b>Date Received</b> 05/05/2004 11:34 AM	<b>Matrix</b> GW	<b>Units</b> ug/L
<b>Begin</b>	<b>End</b>	<b>Collected by</b> JACOBS, JANE
<b>Date Collected</b>	05/04/2004 11:00 AM	<b>Sample Type</b> AMBIENT
<b>Program</b> SEDO-DDAGW		<b>Station ID</b> BEL08861
<b>Client</b> GROUND_WATER		<b>Customer ID</b> 13
<b>Location</b> MTS Ferry Well 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Benzene	000071-43-2	<0.50	0.5	05/06/2004	
Bromobenzene	000108-86-1	<0.50	0.5	05/06/2004	
Bromochloromethane	000074-97-5	<0.50	0.5	05/06/2004	
Bromodichloromethane	000075-27-4	<0.50	0.5	05/06/2004	
Bromoform	000075-25-2	<0.50	0.5	05/06/2004	
Bromomethane	000074-83-9	<0.50	0.5	05/06/2004	
n-Butylbenzene	000104-51-8	<0.50	0.5	05/06/2004	
sec-Butylbenzene	000135-98-8	<0.50	0.5	05/06/2004	
tert-Butylbenzene	000098-06-6	<0.50	0.5	05/06/2004	
Carbon tetrachloride	000056-23-5	<0.50	0.5	05/06/2004	
Chlorobenzene	000108-90-7	<0.50	0.5	05/06/2004	
Chloroethane	000075-00-3	<0.50	0.5	05/06/2004	
Chloroform	000067-66-3	<0.50	0.5	05/06/2004	
Chloromethane	000074-87-3	<0.50	0.5	05/06/2004	
2-Chlorotoluene	000095-49-8	<0.50	0.5	05/06/2004	
4-Chlorotoluene	000106-43-4	<0.50	0.5	05/06/2004	
Dibromochloromethane	000124-48-1	<0.50	0.5	05/06/2004	
1,2-Dibromo-3-chloropropane	000096-12-8	<0.50	0.5	05/06/2004	
1,2-Dibromoethane	000106-93-4	<0.50	0.5	05/06/2004	
Dibromomethane	000074-95-3	<0.50	0.5	05/06/2004	
1,2-Dichlorobenzene	000095-50-1	<0.50	0.5	05/06/2004	
1,3-Dichlorobenzene	000541-73-1	<0.50	0.5	05/06/2004	
1,4-Dichlorobenzene	000106-46-7	<0.50	0.5	05/06/2004	
Dichlorodifluoromethane	000075-71-8	<0.50	0.5	05/06/2004	
1,1-Dichloroethane	000075-34-3	<0.50	0.5	05/06/2004	
1,2-Dichloroethane	000107-06-2	<0.50	0.5	05/06/2004	
1,1-Dichloroethene	000075-35-4	<0.50	0.5	05/06/2004	
cis-1,2-Dichloroethene	000156-59-2	<0.50	0.5	05/06/2004	
trans-1,2-Dichloroethene	000156-60-5	<0.50	0.5	05/06/2004	
1,2-Dichloropropane	000078-87-5	<0.50	0.5	05/06/2004	
1,3-Dichloropropane	000142-28-9	<0.50	0.5	05/06/2004	
2,2-Dichloropropane	000594-20-7	<0.50	0.5	05/06/2004	
1,1-Dichloropropene	000563-58-6	<0.50	0.5	05/06/2004	
cis-1,3-Dichloropropene	010061-01-5	<0.50	0.5	05/06/2004	
trans-1,3-Dichloropropene	010061-02-6	<0.50	0.5	05/06/2004	
Ethylbenzene	000100-41-4	<0.50	0.5	05/06/2004	
Hexachlorobutadiene	000087-68-3	<0.50	0.5	05/06/2004	
Isopropylbenzene	000098-82-8	<0.50	0.5	05/06/2004	
4-Isopropyltoluene	000099-87-6	<0.50	0.5	05/06/2004	
Methylene chloride	000075-09-2	<0.50	0.5	05/06/2004	
Methyl-tert-butyl ether	001634-04-4	<0.50	0.5	05/06/2004	
Naphthalene	000091-20-3	<0.50	0.5	05/06/2004	
n-Propylbenzene	000103-65-1	<0.50	0.5	05/06/2004	
Styrene	000100-42-5	<0.50	0.5	05/06/2004	
1,1,1,2-Tetrachloroethane	000630-20-6	<0.50	0.5	05/06/2004	
1,1,2,2-Tetrachloroethane	000079-34-5	<0.50	0.5	05/06/2004	
Tetrachloroethene	000127-18-4	<0.50	0.5	05/06/2004	
Toluene	000108-88-3	<0.50	0.5	05/06/2004	
1,2,3-Trichlorobenzene	000087-61-6	<0.50	0.5	05/06/2004	
1,2,4-Trichlorobenzene	000120-82-1	<0.50	0.5	05/06/2004	
1,1,1-Trichloroethane	000071-55-6	<0.50	0.5	05/06/2004	
1,1,2-Trichloroethane	000079-00-5	<0.50	0.5	05/06/2004	
Trichloroethene	000079-01-6	<0.50	0.5	05/06/2004	
Trichlorofluoromethane	000075-69-4	<0.50	0.5	05/06/2004	
1,2,3-Trichloropropane	000096-18-4	<0.50	0.5	05/06/2004	
1,2,4-Trimethylbenzene	000095-63-6	<0.50	0.5	05/06/2004	
1,3,5-Trimethylbenzene	000108-67-8	<0.50	0.5	05/06/2004	

2004 MAY 14 PM 5:10  
SEDO

# Laboratory Organic Analysis Data Report

<b>Sample</b> 62879	<b>EPA Method</b> USEPA 524.2	<b>Units</b> ug/L
<b>Date Received</b> 05/05/2004 11:34 AM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JANE
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	05/04/2004 11:00 AM	<b>Station ID</b> BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		
<b>Location</b> MTS Ferry Well 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Vinyl chloride	000075-01-4	<0.50	0.5	05/06/2004	
o-Xylene	000095-47-6	<0.50	0.5	05/06/2004	
Total m&p-xylenes	000108-38-3	<0.50	0.5	05/06/2004	
Trihalomethanes (THMs)	Unknown	<0.50	0.5	05/06/2004	

**Field Comments**

**Lab Comments**

**QC / Sample Comments**

**Approved By** DT **On** 5-10-04

*Definition Of Qualifiers is attached when required*

# OhioEPA Division of Environmental Services

## Laboratory Inorganic Analysis Data Report

**Sample** 60572

**Date Received** 10/31/2003 10:49 AM

**Matrix** GW

**Collected by** JACOBS, JANE

**Begin**

**End**

**Sample Type** AMBIENT

**Date Collected**

10/30/2003 12:00 PM

**Station ID** 39BEL08881

**Program** SEDO-DDAGW

**Customer ID** 13

**Client** GROUND\_WATER

**Location** Martins Ferry Well 13

Analysis	Parameter	Storet	Result	Units	Date	Qualifier
Solids_Diss	Total Dissolved Solids	P70300	270	mg/L	11/04/2003	
TOC	TOC	P680	<2.0	mg/L	11/18/2003	
ICP_(WAT)	Aluminum	P1105	<200	ug/L	11/13/2003	
ICP_(WAT)	Barium	P1007	60	ug/L	11/13/2003	
ICP_(WAT)	Calcium	P916	51	mg/L	11/13/2003	
ICP_(WAT)	Chromium	P1034	<30	ug/L	11/13/2003	
ICP_(WAT)	Copper	P1042	<10	ug/L	11/13/2003	
ICP_(WAT)	Hardness, Total	P900	164	mg/L	11/13/2003	
ICP_(WAT)	Iron	P1045	205	ug/L	11/13/2003	
ICP_(WAT)	Magnesium	P927	9	mg/L	11/13/2003	
ICP_(WAT)	Manganese	P1055	751	ug/L	11/13/2003	
ICP_(WAT)	Nickel	P1067	<40	ug/L	11/13/2003	
ICP_(WAT)	Potassium	P937	2	mg/L	11/13/2003	
ICP_(WAT)	Sodium	P929	21	mg/L	11/13/2003	
ICP_(WAT)	Strontium	P1082	197	ug/L	11/13/2003	
ICP_(WAT)	Zinc	P1092	<10	ug/L	11/13/2003	
SIMAA_(WAT)	Arsenic	P1002	<2.0	ug/L	11/12/2003	
SIMAA_(WAT)	Cadmium	P1027	<0.20	ug/L	11/12/2003	
SIMAA_(WAT)	Lead	P1051	<2.0	ug/L	11/12/2003	
SIMAA_(WAT)	Selenium	P1147	<2.0	ug/L	11/12/2003	
Alkalinity	Alkalinity	P410	114	mg/L	11/03/2003	
Chloride	Chloride	P940	24.7	mg/L	11/18/2003	
COD	COD	P340	<10	mg/L	11/25/2003	
Fluoride	Fluoride	P951	0.32	mg/L	11/13/2003	
NO3-NH3	Ammonia	P610	0.075	mg/L	11/04/2003	
NO3-NH3	Nitrate+nitrite	P630	<0.10	mg/L	11/04/2003	
Sulfate	Sulfate	P945	72.9	mg/L	11/20/2003	
TKN-TP	TKN	P625	<0.20	mg/L	11/04/2003	
TKN-TP	Total Phosphorus	P665	<0.010	mg/L	11/04/2003	

**Field Comments**

**Lab Comments**

**QC / Sample Comments**

**Approved By**

*SR*

**On**

*11-18-03*

**Definition Of Qualifiers is attached when required**

2003 DEC -8 AM 10:27  
 O.E.P.A.  
 S.E.D.O.



# OhioEPA Division Environmental Services

## Laboratory Organic Analysis Data Report

<b>Sample</b> 60574	<b>EPA Method</b> USEPA 525.2	<b>Units</b> ug/L
<b>Date Received</b> 10/31/2003 10:49 AM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JANE
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/30/2003 12:00 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		
<b>Location</b> Martins Ferry-Well 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Acetochlor	034256-82-1	<0.21	0.21	11/20/2003	
Alachlor	015972-60-8	<0.21	0.21	11/20/2003	
Atrazine	001912-24-9	<0.21	0.21	11/20/2003	
Benzo[a]pyrene	000050-32-8	<0.51	0.51	11/20/2003	
bis(2-Ethylhexyl)adipate	000103-23-1	<0.51	0.51	11/20/2003	
bis(2-Ethylhexyl)phthalate	000117-81-7	<0.51	0.51	11/20/2003	
Butachlor	023184-66-9	<0.21	0.21	11/20/2003	
Cyanazine	021725-46-2	<0.21	0.21	11/20/2003	
Metolachlor	051218-45-2	<0.21	0.21	11/20/2003	
Metribuzin	021087-64-9	<0.21	0.21	11/20/2003	
Pentachlorophenol	000087-86-5	<5.1	5.1	11/20/2003	
Propachlor	001918-16-7	<0.21	0.21	11/20/2003	
Simazine	000122-34-9	<0.21	0.21	11/20/2003	

**Field Comments**

**Lab Comments**

**QC / Sample Comments**

**Approved By**  **On**

*Definition Of Qualifiers is attached when required*

2003 DEC -8 AM 8:20

O.E.P.A.  
S.E.D.O.

# OhioEPA Division Environmental Services

## Laboratory Organic Analysis Data Report

<b>Sample</b> 60574	<b>EPA Method</b> USEPA 608	<b>Units</b> ug/L
<b>Date Received</b> 10/31/2003 10:49 AM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JANE
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/30/2003 12:00 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		
<b>Location</b> Martins Ferry Well 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Aldrin	000309-00-2	<0.0020	0.002	11/07/2003	
a-BHC	000319-84-6	<0.0020	0.002	11/07/2003	
b-BHC	000319-85-7	<0.0020	0.002	11/07/2003	
d-BHC	000319-86-8	0.0036	0.002	11/07/2003	B
γ-BHC	000058-89-9	<0.0020	0.002	11/07/2003	
4,4'-DDD	000072-54-8	<0.0062	0.006	11/07/2003	
4,4'-DDE	000072-55-9	<0.0020	0.002	11/07/2003	
4,4'-DDT	000050-29-3	<0.0062	0.006	11/07/2003	
Dieldrin	000060-57-1	<0.0020	0.002	11/07/2003	
Endosulfan I	000959-98-8	<0.0020	0.002	11/07/2003	
Endosulfan II	033213-65-9	<0.0020	0.002	11/07/2003	
Endosulfan sulfate	001031-07-8	<0.020	0.02	11/07/2003	
Endrin	000072-20-8	<0.0020	0.002	11/07/2003	
Endrin aldehyde	007421-93-4	<0.0062	0.006	11/07/2003	
Heptachlor	000076-44-8	<0.0020	0.002	11/07/2003	
Heptachlor epoxide	001024-57-3	<0.0020	0.002	11/07/2003	
Methoxychlor	000072-43-5	<0.010	0.01	11/07/2003	
Mirex	002385-85-5	<0.010	0.01	11/07/2003	
Hexachlorobenzene	000118-74-1	<0.0020	0.002	11/07/2003	

Field Comments

Lab Comments

QC / Sample  
Comments

Approved By

*RL*

On

11/12/03

Definition Of Qualifiers is attached when required

# OhioEPA Division Environmental Services

## Laboratory Organic Analysis Data Report

<b>Sample</b> 60574	<b>EPA Method</b> USEPA 524.2	<b>Units</b> ug/L
<b>Date Received</b> 10/31/2003 10:49 AM	<b>Matrix</b> GW	<b>Collected by</b> JACOBS, JANE
<b>Begin</b>	<b>End</b>	<b>Sample Type</b> AMBIENT
<b>Date Collected</b>	10/30/2003 12:00 PM	<b>Station ID</b> 39BEL08881
<b>Program</b> SEDO-DDAGW		<b>Customer ID</b> 13
<b>Client</b> GROUND_WATER		
<b>Location</b> Martins Ferry Well 13		

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Benzene	000071-43-2	<0.50	0.5	11/04/2003	
Bromobenzene	000108-86-1	<0.50	0.5	11/04/2003	
Bromochloromethane	000074-97-5	<0.50	0.5	11/04/2003	
Bromodichloromethane	000075-27-4	<0.50	0.5	11/04/2003	
Bromoform	000075-25-2	<0.50	0.5	11/04/2003	
Bromomethane	000074-83-9	<0.50	0.5	11/04/2003	
n-Butylbenzene	000104-51-8	<0.50	0.5	11/04/2003	
sec-Butylbenzene	000135-98-8	<0.50	0.5	11/04/2003	
tert-Butylbenzene	000098-06-6	<0.50	0.5	11/04/2003	
Carbon tetrachloride	000056-23-5	<0.50	0.5	11/04/2003	
Chlorobenzene	000108-90-7	<0.50	0.5	11/04/2003	
Chloroethane	000075-00-3	<0.50	0.5	11/04/2003	
Chloroform	000067-66-3	<0.50	0.5	11/04/2003	
Chloromethane	000074-87-3	<0.50	0.5	11/04/2003	
2-Chlorotoluene	000095-49-8	<0.50	0.5	11/04/2003	
4-Chlorotoluene	000106-43-4	<0.50	0.5	11/04/2003	
Dibromochloromethane	000124-48-1	<0.50	0.5	11/04/2003	
1,2-Dibromo-3-chloropropane	000096-12-8	<0.50	0.5	11/04/2003	
1,2-Dibromoethane	000106-93-4	<0.50	0.5	11/04/2003	
Dibromomethane	000074-95-3	<0.50	0.5	11/04/2003	
1,2-Dichlorobenzene	000095-50-1	<0.50	0.5	11/04/2003	
1,3-Dichlorobenzene	000541-73-1	<0.50	0.5	11/04/2003	
1,4-Dichlorobenzene	000106-46-7	<0.50	0.5	11/04/2003	
Dichlorodifluoromethane	000075-71-8	<0.50	0.5	11/04/2003	
1,1-Dichloroethane	000075-34-3	<0.50	0.5	11/04/2003	
1,2-Dichloroethane	000107-06-2	<0.50	0.5	11/04/2003	
1,1-Dichloroethene	000075-35-4	<0.50	0.5	11/04/2003	
cis-1,2-Dichloroethene	000156-59-2	<0.50	0.5	11/04/2003	
trans-1,2-Dichloroethene	000156-60-5	<0.50	0.5	11/04/2003	
1,2-Dichloropropane	000078-87-5	<0.50	0.5	11/04/2003	
1,3-Dichloropropane	000142-28-9	<0.50	0.5	11/04/2003	
2,2-Dichloropropane	000594-20-7	<0.50	0.5	11/04/2003	
1,1-Dichloropropene	000563-58-6	<0.50	0.5	11/04/2003	
cis-1,3-Dichloropropene	010061-01-5	<0.50	0.5	11/04/2003	
trans-1,3-Dichloropropene	010061-02-6	<0.50	0.5	11/04/2003	
Ethylbenzene	000100-41-4	<0.50	0.5	11/04/2003	
Hexachlorobutadiene	000087-68-3	<0.50	0.5	11/04/2003	
Isopropylbenzene	000098-82-8	<0.50	0.5	11/04/2003	
4-Isopropyltoluene	000099-87-6	<0.50	0.5	11/04/2003	
Methylene chloride	000075-09-2	<0.50	0.5	11/04/2003	
Methyl-tert-butyl ether	001634-04-4	<0.50	0.5	11/04/2003	
Naphthalene	000091-20-3	<0.50	0.5	11/04/2003	
n-Propylbenzene	000103-65-1	<0.50	0.5	11/04/2003	
Styrene	000100-42-5	<0.50	0.5	11/04/2003	
1,1,1,2-Tetrachloroethane	000630-20-6	<0.50	0.5	11/04/2003	
1,1,2,2-Tetrachloroethane	000079-34-5	<0.50	0.5	11/04/2003	
Tetrachloroethene	000127-18-4	<0.50	0.5	11/04/2003	
Toluene	000108-88-3	<0.50	0.5	11/04/2003	
1,2,3-Trichlorobenzene	000087-61-6	<0.50	0.5	11/04/2003	
1,2,4-Trichlorobenzene	000120-82-1	<0.50	0.5	11/04/2003	
1,1,1-Trichloroethane	000071-55-6	<0.50	0.5	11/04/2003	
1,1,2-Trichloroethane	000079-00-5	<0.50	0.5	11/04/2003	
Trichloroethene	000079-01-6	<0.50	0.5	11/04/2003	
Trichlorofluoromethane	000075-69-4	<0.50	0.5	11/04/2003	
1,2,3-Trichloropropane	000096-18-4	<0.50	0.5	11/04/2003	
1,2,4-Trimethylbenzene	000095-63-6	<0.50	0.5	11/04/2003	
1,3,5-Trimethylbenzene	000108-67-8	<0.50	0.5	11/04/2003	

# OhioEPA Division C. Environmental Services

## Laboratory Organic Analysis Data Report

<b>Sample</b>	60574	<b>EPA Method</b>	USEPA 524.2
<b>Date Received</b>	10/31/2003 10:49 AM	<b>Matrix</b>	GW
<b>Begin</b>		<b>End</b>	
<b>Date Collected</b>		10/30/2003 12:00 PM	
<b>Program</b>	SEDO-DDAGW	<b>Collected by</b>	JACOBS, JANE
<b>Client</b>	GROUND_WATER	<b>Sample Type</b>	AMBIENT
<b>Location</b>	Martins Ferry Well 13	<b>Station ID</b>	39BELQ8881
		<b>Customer ID</b>	13

Parameter	Cas Number	Result	RL	Analyzed	Qualifier
Vinyl chloride	000075-01-4	<0.50	0.5	11/04/2003	
o-Xylene	000095-47-6	<0.50	0.5	11/04/2003	
Total m&p-xylenes	000108-38-3	<0.50	0.5	11/04/2003	

**Field Comments**

**Lab Comments**

**QC / Sample Comments**

Approved By DT On 11-12-03

Definition Of Qualifiers is attached when required